TSD File Inventory Index

Date: June 4, 2002

Initial: CMGerrard

Facility Name:	Chistwet Corporation (One Folder Site)		
Facility Identification Number:	MID 098 678 584		
A.1 General Correspondence		**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status	Y	.1 Correspondence	
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	**C.1 Compliance - (Inspection Reports)**	Y
.3 Part A Application and Amendments		**C.2 Compliance/Enforcement**	Y
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring	Y	**D.1 Corrective Action/Facility Assessment**	
.1 Correspondence	Y	.1 RFA Correspondence	
.2 Reports	Y	.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	Y	.3 State Prelim. Investigation Memos	
.1 Correspondence	Y	.4 RFA Reports	
.2 Closure/Post Closure Plans, Certificates, etc	Y	**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		**D.5 Corrective Action/Enforcement**	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		**D.6 Environmental Indicator Determinations**	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		**E. Boilers and Industrial Furnaces (BIF)**	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		**F Imagery/Special Studies** (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		**G.1 Risk Assessment**	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.
Comments: Documents do not justify individual folders/schedule.

A.2 Part A/
Interim Status

UNISTRUT GTE
Building Systems

GTE Products Corporation
Elizabeth & Clinton
P.O. Box 802
Wayne, MI 48184
Phone: (313) 721-4040
Telex: 23-5457

February 24, 1986

EPA - Region #5
RCRA Section
P.O. Box A3587
Chicago, IL 60690

Re : Generator I.D. # MID098678584 PA

To Whom It May Concern :

Effective, January 31, 1986, Unistrut Division of GTE Products Corporation at 35005 Michigan Avenue West, Wayne, Michigan, 48184, became Unistrut Corporation operating at the same address.

If you have any questions, please feel free to contact me.

Sincerely,

R.A. Schierschmidt

R.A. Schierschmidt
Mfg. Eng. Supervisor

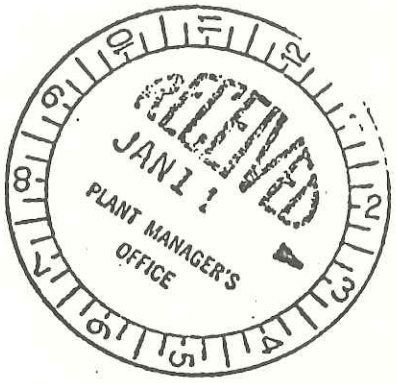
RAS/clm

Ref : 86-17

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA Activities

JAN 12 1982



Mr. John F. German
Vice President, Manufacturing Operations
Unistrut Division
GTE Products Corporation
35005 Michigan Avenue West
Wayne, Michigan 48184

Re: Part A Application Withdrawal
Facility Name: GTE Products Corporation
EPA ID No: MID098678584

General Tele + Elec Unistrut

Dear Mr. German:

This is to acknowledge that the U.S. Environmental Protection Agency (EPA) has completed processing your Part A Hazardous Waste Permit Application and reviewed your letter of December 4, 1981, requesting the withdrawal of your permit application. It is the opinion of this office, based on the information submitted, that your facility is a small quantity generator as prescribed in 40 CFR Part 261; and, therefore, you are not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act. We have enclosed your Part A application.

Please be advised that you must ensure delivery of your waste to an off-site treatment, storage, or disposal facility permitted in accordance with 40 CFR Part 261.5 (d). You may retain your EPA identification number (MID098678584), as you have requested to have your waste removed as a small quantity generator.

If, at a later date, your facility does treat, store, or dispose of hazardous waste in regulated amounts, you must resubmit your Part A application as provided in 40 CFR Part 122.

Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions regarding this letter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ • MID098678584 REACKNOWLEDGEMENT

GENERAL TELE & ELEC UNISTRUT DIV
4118 SOUTH WAYNE ROAD
WAYNE MI 48184

INSTALLATION ADDRESS ➤ 4118 SOUTH WAYNE ROAD
WAYNE MI 48184

EPA Form 8700-12B (4-80)

10/03/81

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA
U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO. ~~MIR0672332650~~ MID098678584

I. NAME OF INSTALLATION ~~UNISTRUT CORPORATION~~ OK

II. INSTALLATION MAILING ADDRESS ~~35005 MICHIGAN AVE~~
WAYNE, MI 48184
SMALL QUANTITY GENERATOR

III. LOCATION OF INSTALLATION ~~35005 MICHIGAN AVE~~
WAYNE, MI 48184
000290 AUG 22 80

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

MID098678584

INSTALLATION'S EPA I.D. NUMBER: FMID067332650 2 1 | APPROVED: A | DATE RECEIVED (yr., mo., & day): 80 08 18

GENERAL TELE + ELEC
UNISTRUT DIV

I. NAME OF INSTALLATION

UNISTRUT DIVISION OF GTE

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 4118 SOUTH WAYNE ROAD

CITY OR TOWN: WAYNE | ST.: MI | ZIP CODE: 48184

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 4118 SOUTH WAYNE ROAD

CITY OR TOWN: WAYNE | ST.: MI | ZIP CODE: 48184

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: SHROPE STEVE - MFG. ENG. | PHONE NO. *(area code & no.)*: 313-721-4040

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: GENERAL TELEPHONE & ELECTRONICS

DETACH

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*
F = FEDERAL
M = NON-FEDERAL
M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: MID098678584

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 19 1980

CONTINUE ON REVERSE

84

I.D. – FOR OFFICIAL USE ONLY

S												T/A	C
W	M	I	D	0	9	8	6	7	8	5	4	8	2	1
1	2										13	14	15	

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F006					
7	**8**	**9**	**10**	**11**	**12**
F017					

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U031					
37	**38**	**39**	**40**	**41**	**42**
U159					
43	**44**	**45**	**46**	**47**	**48**
U239					

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

[X] WASTE OILS

[ ] 1. IGNITABLE (D001) [ ] 2. CORROSIVE (D002) [ ] 3. REACTIVE (D003) [ ] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Fred K. Rusher	Fred K. Rusher Production Manager	8/14/80

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Re e "General Instructions" before starting.)

I. EPA I.D. NUMBER

F M I D 0 9 8 6 7 8 5 8 4 | D

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP GENERAL TELE + ELEC UNISTRUT DIV.

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 SHROPE STEVE - MFG. ENG.	313 721 4040

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 4118 SOUTH WAYNE ROAD

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 WAYNE	MI	48184

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 4118 SOUTH WAYNE ROAD

B. COUNTY NAME

WAYNE

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 WAYNE	MI	48184	

DEC 1 8 1980

NOV 19 1980

CONTINUE ON REVERSE

U.S. ENVIRONMENTAL PROTECTION AGENCY

EPA GENERAL INFORMATION

Consolidated Permits Program

(Read "General Instructions" before starting.)

F M I D 0 9 8 6 7 8 5 8 4 3

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GENERAL LABEL ITEMS

I. EPA I.D. NUMBER

III. FACILITY NAME

V. FACILITY MAILING ADDRESS

VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP GENERAL TELE + ELEC UNISTRUT DIV.

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 SHROPE STEVE - MFG. ENG.	313 721 4040

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 4118 SOUTH WAYNE ROAD

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 WAYNE	MI	48184

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 4118 SOUTH WAYNE ROAD

B. COUNTY NAME

WAYNE

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 WAYNE	MI	48184	163

EPA Form 3510-1 (6-80)

DEC 1 1980

NOV 19 1980

CONTINUE ON REVERSE

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175 436

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F M I D 0 9 8 6 7 8 5 8 4

LABEL ITEMS

I. EPA I.D. NUMBER

II. FACILITY NAME

III. FACILITY MAILING ADDRESS

IV. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

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SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: UNISTRUT DIVISION OF GTE

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 SHROPE STEVE - MFG. ENG.	313 721 4040

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
3 4118 SOUTH WAYNE ROAD			
B. CITY OR TOWN	**C. STATE**	**D. ZIP CODE**	
4 WAYNE	MI	48184	

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
5 4118 SOUTH WAYNE ROAD			
B. COUNTY NAME			
WAYNE			
C. CITY OR TOWN	**D. STATE**	**E. ZIP CODE**	**F. COUNTY CODE (if known)**
6 WAYNE	MI	48184	163

EPA Form 3510-1 (6-80)

DEC 19 1980

NOV 19 1980

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
(specify) 3440 FABRICATED STRUCTURAL METAL PRODUCTS	(specify)
C. THIRD	**D. FOURTH**
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: UNISTRUT DIVISION OF GTE

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL; S = STATE; P = PRIVATE; M = PUBLIC (other than federal or state); O = OTHER (specify)

P (specify) PRIVATE

D. PHONE (area code & no.) A 313 721 4040

E. STREET OR P.O. BOX: 4118 SOUTH WAYNE ROAD

F. CITY OR TOWN: WAYNE

G. STATE: MI

H. ZIP CODE: 48184

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	**D. PSD** (Air Emissions from Proposed Sources)
9 N	9 P
B. UIC (Underground Injection of Fluids)	**E. OTHER** (specify)
9 U	9 (specify) —
C. RCRA (Hazardous Wastes)	**E. OTHER** (specify)
9 R MID067332650	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

A

XII. NATURE OF BUSINESS (provide a brief description)

Receive Coil & Strip Steel
Roll Form Steel Channel
Stamp Steel Fittings
Weld Channel & Fittings
Paint Channel & Fittings
Plate Fittings
Store & Ship Channel & Fittings

A

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
John F. German Vice President Manuf. Operations	John F. German	11/19/80

COMMENTS FOR OFFICIAL USE ONLY

ORIGINAL YOM

ontinued from the front.

II. PROCESSES *(continued)*

. SPACE FOR ADDITIONAL PROCESS CODES [illegible] FOR DESCRIBING OTHER PROCESSES *(code "T[illegible]* FOR EACH PROCESS ENTERED HERE: INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. *(enter code)*	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE *(enter code)*	D. PROCESSES 1. PROCESS CODES *(enter)*	D. PROCESSES 2. PROCESS DESCRIPTION *(if a code is not entered in D(1))*
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				*included with above*

(fill—in areas are spaced for elite type, i.e., 12 characters/inch). Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F M I D 0 9 8 6 7 8 5 8 4 (T/A: 3 1)

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	7 2	0 4	1 0

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP (T/A: 3 1)

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	8,800	G		7				
2	S 0 2	5,000	G		8				
3					9				
4					10				

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1): WMID 098678584

FOR OFFICIAL USE ONLY: W DUP 2 DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F006	20,000	P	S01	
2	F017	3,000	P	S01	
3	U031	50	P	S01	Stored on plant property until
4	U159	50	P	S01	shipment for disposal - (maybe
5	U239	50	P	S01	longer than 90 days).
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Continued from the front.

V. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITION PROCESS CODES FROM ITEM D(1) ON PA 3.

Waste oils are stored in a 5,000 gallon underground tank (S02) until shipped for disposal on a yearly basis.

EPA I.D. NO. *(enter from page 1)*

												T/A	C
M	I	D	0	9	8	6	7	8	5	8	4	X	6

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* A

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* A

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*									LONGITUDE *(degrees, minutes, & seconds)*								
4	2	1	6	3	6	N			0	8	3	2	3	2	2	W	
65	66	67	68	69	-	71			72	-	74	75	76	77	-	79	

VIII. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
	C G		

IX. OWNER CERTIFICATION

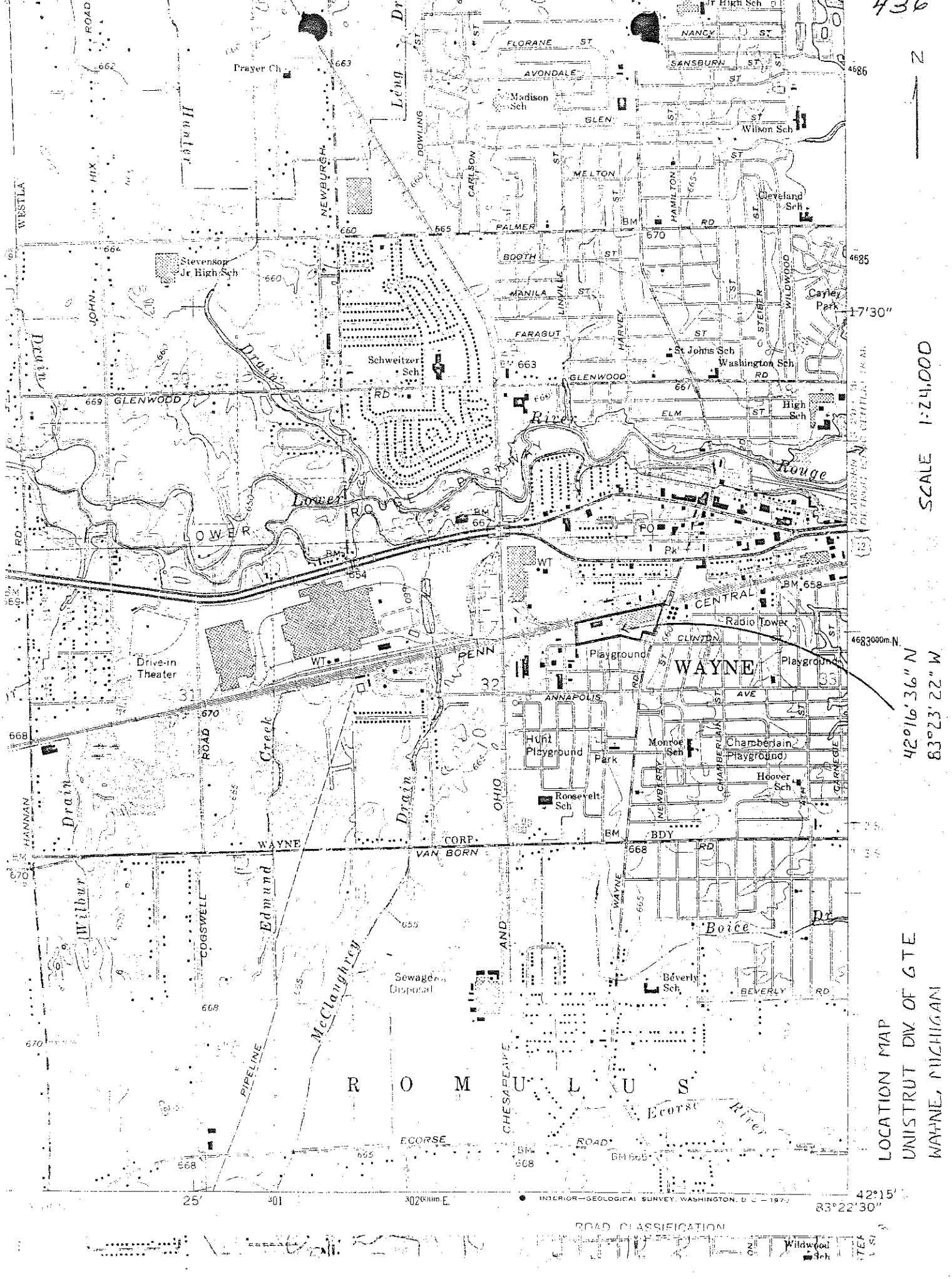
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
JOHN F. GERMAN VICE PRESIDENT MANUF. OPER.	John F. German	11/19/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

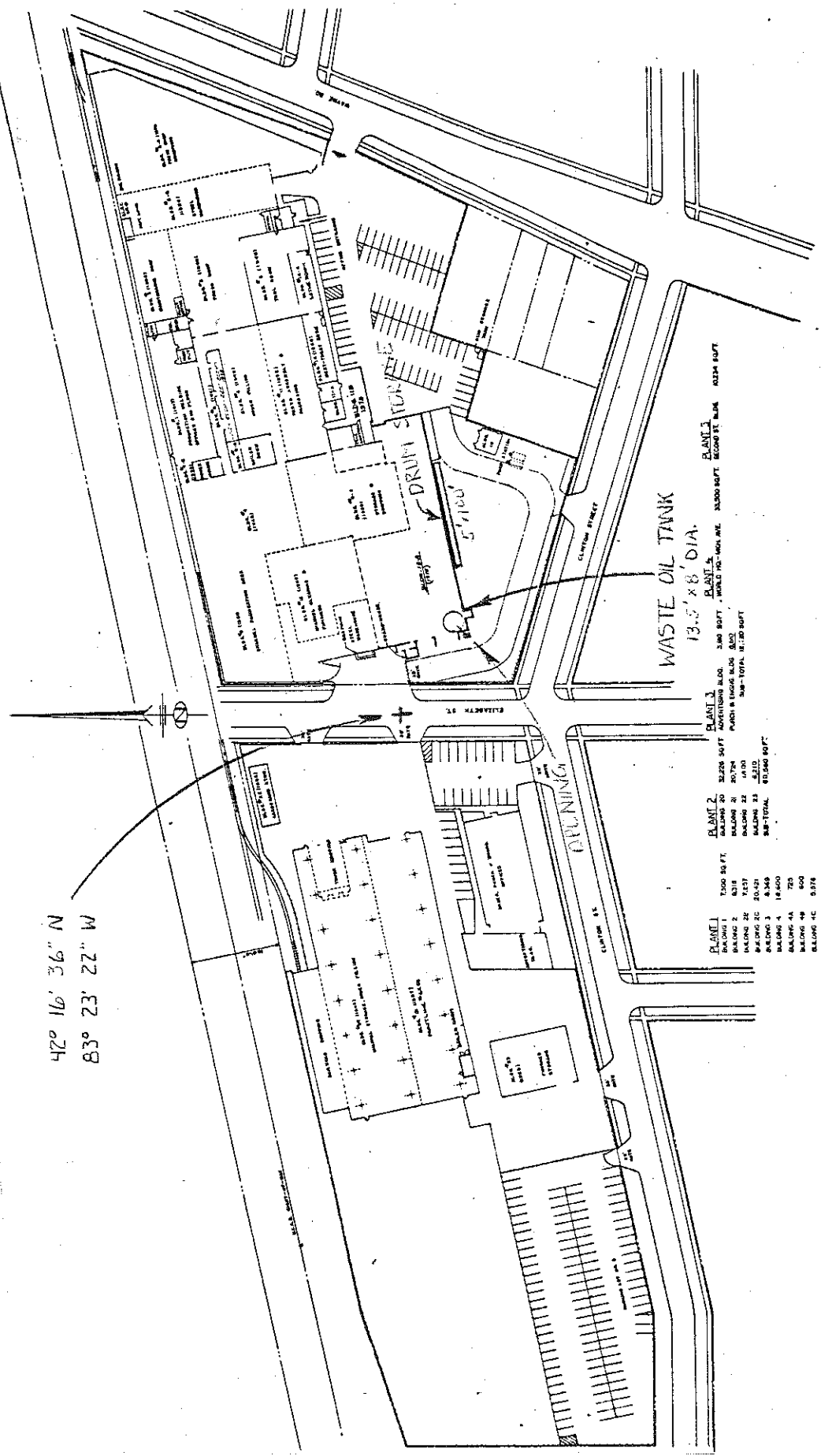
A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED

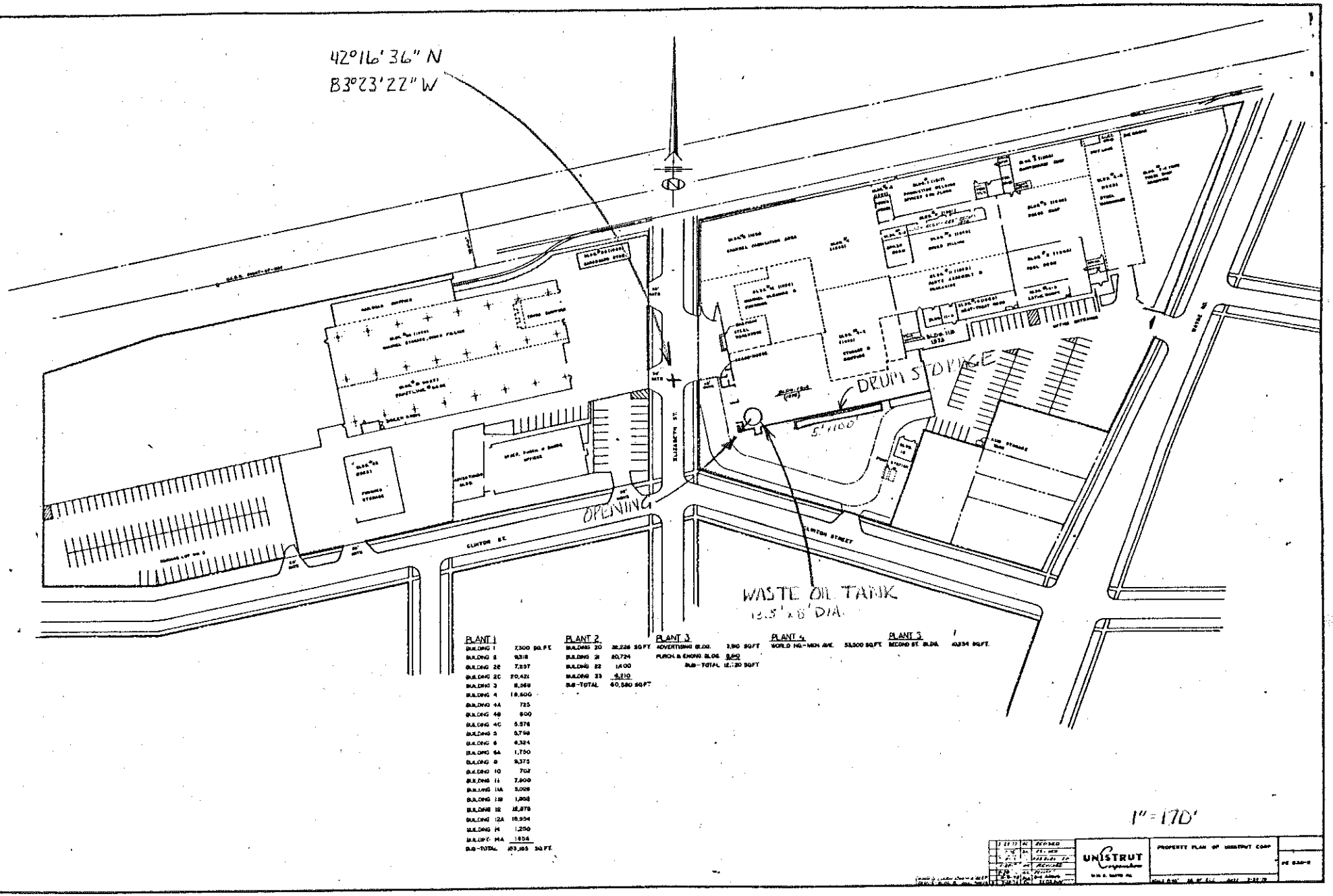

LOCATION MAP
UNISTRUT DIV OF GTE
WAYNE, MICHIGAN
SCALE 1:24,000
42°16'36" N
83°23'22" W
42°15'
83°22'30"
ROMULUS
WAYNE
LOWER
Lower Rouge River
Rouge River
Prayer Ch
Madison Sch
Wilson Sch
Cleveland Sch
Stevenson Jr High Sch
Schweitzer Sch
St Johns Sch
Washington Sch
High Sch
Cayley Park
Drive-in Theater
Hunt Playground
Park
Monroe Sch
Chamberlain Playground
Hoover Sch
Roosevelt Sch
Playground
Radio Tower
Sewage Disposal
Beverly Sch
Wildwood Sch
Wilbur Edmund Drain
McClaughrey Pipeline
Ecorse River
Creek
Drain
NANCY ST
FLORANE ST
AVONDALE
SANSBURN ST
GLEN ST
MELTON ST
PALMER
BOOTH ST
MANILA ST
FARAGUT ST
GLENWOOD RD
ELM ST
CENTRAL
CLINTON ST
PENN
ANNAPOLIS ST
VAN BORN
CORP
ECORSE ROAD
BEVERLY RD
WESTLA
NEWBURGH
DOWLING
CARLSON
HAMILTON
LINVILLE
HARVEY
STEIBER
WILDWOOD
JOHN HIX
HANNAN ROAD
COGSWELL
OHIO
CHESAPEAKE
WAYNE
CHAMBERLAIN
NEWBERRY
CARNEGIE
BM 658
BM 663
BM 670
BM 668
BM 665
WT
PO
Pk
4686
4685
4683000m.N.
302000m.E.
25'
301
INTERIOR—GEOLOGICAL SURVEY, WASHINGTON, D. C.
ROAD CLASSIFICATION

Form Approved OMB No. 158-S80004

4/36

V. FACILITY DRAWING *(see page 4)*





PLANT 1		PLANT 2		PLANT 3		PLANT 4		PLANT 5	
BUILDING 1	7,500 SQ.FT.	BUILDING 20	38,226 SQ.FT.	ADVERTISING BLDG.	3,190 SQ.FT.	WORLD HQ-MICH. AVE.	53,500 SQ.FT.	SECOND ST. BLDG.	40,234 SQ.FT.
BUILDING 2	9,318	BUILDING 21	20,724	PURCH. & ENGNG. BLDG.	8,640				
BUILDING 2B	7,237	BUILDING 22	1400	SUB-TOTAL	12,730 SQ.FT.				
BUILDING 2C	20,421	BUILDING 23	4,210						
BUILDING 3	8,368	SUB-TOTAL	60,580 SQ.FT.						
BUILDING 4	18,600								
BUILDING 4A	725								
BUILDING 4B	800								
BUILDING 4C	5,376								
BUILDING 5	5,798								
BUILDING 6	4,324								
BUILDING 6A	1,750								
BUILDING 8	9,375								
BUILDING 10	702								
BUILDING 11	7,900								
BUILDING 11A	5,028								
BUILDING 11B	1,808								
BUILDING 12	18,878								
BUILDING 12A	18,934								
BUILDING 14	1,250								
BUILDING 14A	1854								
SUB-TOTAL	193,185 SQ.FT.								

UNISTRUT

PROPERTY PLAN OF UNISTRUT CORP

DETAIL MAP
UNISTRUT DIV. OF G.T.E.
WAYNE, MICH.

A.3 Groundwater/ Soil Documents

Unistrut Division
GTE Pr[illegible]cts Corporation
35005 [illegible]nigan Avenue West
Wayne MI 48184
313 721 4040 Telex 23 5457

UNISTRUT Building Systems

MID 098678584
9. TSD, PA
MAR 12 1982

Permit Application Contact
RCRA Activities
Region V
P.O. Box A3537
Chicago, IL 60690

GTE

December 4, 1981

Dear Sir :

Enclosed are the independent laboratory tests of samples from our electro-plater waste treatment system which is classified on Unistrut's Hazardous Waste Permit, dated 11-19-80, as U.S. - E.P.A. Hazardous Waste Number F006.

Unistrut's electro-plating operation is a segregated zinc on carbon steel process which is exempted according to 40 CFR, Part 261 - Subpart D - Section 261.5 - Classification Number F006.

Additional items listed on Unistrut's Hazardous Waste Permit are the U.S. - E.P.A. Hazardous Waste Numbers : F017, U031, U159 and U238. The total quantity of these items generated per month is less than 1000 kilograms and is disposed of at an approved hazardous waste site before quantities of 1000 kilograms have accumulated. Per 40 CFR, Part 261.5 - Sections A & B, a total of less than 1000 kilograms per calendar month and quantities accumulated of less than 1000 kilograms before disposal, are not subject to notification requirements of Section 3010 of the Resource Conservation & Recovery Act and 40 CFR - 262-265.

Based on the above reasons, Unistrut requests withdrawal of our Hazardous Waste Permit Application. Pending your response to our request, Unistrut will continue to treat these items as hazardous materials.

Since many removal companies require Manufacturers E.P.A. Identification Numbers, regardless of the nature of the manufacturer's waste, we are requesting Unistrut be permitted to retain our E.P.A. Identification Number.

Sincerely,

John F. German

John F. German
V.P. - Operations

enc.
Ref : 81-230
JG/cm

RECEIVED
DEC [illegible]
WASTE MANAGEMENT BRANCH
EPA, REGION V

RECEIVED
12/09/81

Analytic & Biological
Laboratories, Inc.

29079 FORD ROAD ■ GARDEN CITY, MICHIGAN 48135 ■ PHONE: (313) 422-7474

REPORT OF ANALYSIS

DATE Dec.4, 1981

SUBMITTED BY: Unistrut Corporation
35660 Clinton
Wayne, MI 48184
Attn: Mr. Hiem

DATE RECEIVED: November 24, 1981

A.B.L. NUMBER: 120481-32 P.O.# 19261

ANALYSIS REQUESTED: One (1) sample submitted for EPA Hazardous Waste Testing Program

METHOD OF ANALYSIS: "EPA Office of Water & Waste Management, Washington, D.C. 20460 Sw-846, 1980"
"Test Methods for Evaluating Solid Waste."
Physical / Chemical Methods

RESULTS:

4 Platter Sludge

- denotes a quantity of "less than"

See attached sheets.

ANALYTIC & BIOLOGICAL LABORATORIES, INC.

Francis B. McLaughlin, FAIC
Director of Laboratories

FBM/ns
cc:files

RECEIVED 12/09/81

IGNITABILITY

Definition:

Identifies wastes that pose a fire hazard due to being ignitable under routine storage, disposal and transportation. Fires not only present an immediate danger due to heat and smoke, but they can also spread harmful particles over wide-spread areas.

It is a liquid, other than an aqueous solution containing less than 24 percent alcohol by volume, and has a flash point less than 60°C (140°F), as determined by a Pensky-Martens Closed Cup Tester, using the test method specified in ASTM Standard D-93-79.

Sample Flash Point

Non-Ignitable

CORROSIVITY

Definition:

Identifies wastes which require special containers and handling because of their ability to corrode standard materials, require segregation from other wastes because of their ability to dissolve toxic contaminants or destroy human or animal tissue in the event of inadvertant contact.

It is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5.

It is a liquid and corrodes steel (SAE 1020 at a rate greater than 6.35mm (0.250 inch) per year at a test temperature of 55°C (130°F).

Sample Corrosivity

pH 7.0 units

Non-Corrosive

REACTIVITY

Definition:

Identifies waste that tend to react spontaneously, to react vigorously with air or water, to be unstable to shock or heat, to generate toxic gases or to explode.

Unstable - water reactant, forms explosive mixtures, generates toxic gases, explosive.

Sample Reactivity

Non-Reactive

AMPLE IDENTIFICATION: # 4 Platter Sludge

EXTRACTION PROCEDURE (EP) TOXICITY

Definition- - -Identifies a waste whose constituents have a tendancy to leach or migrate when disposed of in an improperly designed sanitary landfill.

A solid waste exhibits the characteristic of EP Toxicity if the extract obtained from a representative sample of the waste is analyzed and is found to exceed the threshold levels established for the following elements:

Contaminant	Max. Concentration (ppm)	Concentration Found (ppm)
Arsenic	5.0	-0.1
Barium	100.0	2.239
Cadmium	1.0	0.091
Copper	100	0.467
Chromium	5.0	0.475
Cyanide	20	- 0.05
Lead	5.0	1.821
Mercury	0.2	-0.01
Selenium	1.0	-0.01
Silver	5.0	-0.01
Zinc	500.0	1.257

Endrin (1,2,3,4,10,10-Hexachloro-1 7-epoxy-1,4,4a,5,6,7,8,8a octahydro-1 4-endo, endo-5,8-dimethanonaphthalene)	0.02
Lindane (1,2,3,4,5,6,-) Hexachlorocyclohexane,gamma isomer	0.4
Methoxychlor (1,1,1-Trichloro-2,2-bis (p·methoxyphenyl) ethane)	10.0
Toxaphene ($C_{10}H_{10}Cl_8$-Technical chlorinated camphene, 67-69 percent chlorine)	0.5
2,4,·D (2,4-Dichlorophenoxyacetic acid)	10.0
2,4,5-TP (Silvex) (2,4,5-Trichlorophenoxypropionic acid)	1.0

SAMPLE IDENTIFICATION: # 4 Platter Sludge

4 Platter Sludge

Parameter	(ppm)
Lead	58.52
Zinc	26.2
Nickel	70.72
Copper	22.16
Mercury	-0.01
Beryllium	-0.1
Cadmium	3.98
Chromium (Tri)	2,660
Chromium (Hex)	-0.5
Chlorine	N/A
Bromine	N/A
Arsenic	-0.1
Phosphorous	3,400
Sulfur	5,700
Cyanide	-0.1
Noncombustible Ash	16.64 (%)
Phenol	-0.5
PCB	-0.5

ANALYTIC & BIOLOGICAL LABORATORIES, INC.

#4 Platter Sludge

GENERATOR WASTE ANALYSIS FORM LOG NO. _____

WASTE GENERATOR GENERATOR NO. _____
Name: _____
Address: _____
City: _____ Zip: _____
Phone: _____ Date: _____
Contact Person: _____
Signature: _____

WASTE HAULER *HAULER NO. _____
Co. Name: _____
Address: _____
City: _____ Zip: _____

DISPOSAL METHOD & FACILITY TO BE USED
__Incineration __Landfill __Reclaimed
__Other (explain): _____

FACILITY NO: _____ Tel: _____
Name: _____
Address: _____
City: _____ Zip: _____

PHYSICAL STATE @ 25°C (circle one)
☒ Solid: Dusting hazard if containers are opened? No
☐ Liquid/Sludges: ____ % solid ____ pH
Waste can be pumped?____ poured?____
☐ Liquid/Solid Phases:____% solid
____% free flowing liquid layer
☐ Gases: Pressure of container ____PSIG

___ EP Leacnate extraction attached.
___ Flammable: ___ Flash Point. ___ pH
___ Chemically reactive _____
___ Toxic ___ Corrosive ___ Irritant
___ Odor ___ Explosive ___ Infectious
___ Volatility (if greater than acetone)
Other: _____

GENERAL DESCRIPTION OF WASTE AND PROCESS GENERATING WASTE

_____

_____

_____

OLUME OF WASTE MATERIAL & CONTAINMENT
____Gallons ____Cubic yards. Container:
____bulk. Other _____
HAULED: ___times per ___ week ___ month
___ year. ____ Only hauled once.

IDENTIFY MAJOR COMPONENTS: 1% (10,000 mg/kg) or greater of waste content. Total major and minor components must add up to 100%.

Compound or Element	Concentration
Solids	100%

MINOR COMPONENTS: Concentration in mg/kg, mg/ or ppm, of waste con[illegible] (Element and/or Compound).

INORGANIC METALS:

1.	58.52	Lead	5.	-0.01	Mercury
2.	26.2	Zinc	6.	-0.1	Beryllium
3.	70.72	Nickel	7.	3.98	Cadmium
4.	22.16	Copper	8.	2660	Trivalent Chromium
			9.	-0.5	Hexavalent Chromium

INORGANIC NON-METALS:

10.	N/A	Chlorine	13.	3,400	Phosphorus
11.	N/A	Bromine	14.	5,700	Sulfur
12.	-0.1	Arsenic	15.	-0.1	Cyanide
16.	16.64 %	Noncombustible Ash			

DOES THE WASTE MATERIAL CONTAIN ANY OF THE FOLLOWING:

Class of Compound	Yes	No
16. Halogenated aromatics (e.g. PCB, PBB)	___	X
17. Other Halogenated organics	___	X
18. Aromatic Amines	___	X
19. Pesticides	___	X
20. Aromatic Ureas or Thioureas	___	X
21. Cyclic Nitrogen (toxic) (e.g. Pyridine)	___	X
22. Phenols, to include nitro & halogenated phenols & salt	___	X
23. Quinones	___	X
24. Phosphorus compounds (e.g. phosphates)	X	___
25. Polycyclic organics	___	X
26. Asbestos	___	X
27. Any other material listed on Mi. Critical Materials Reg.	___	X

NOTE:
State what methods were utilized to derive the data for major and minor compounds (Analysis, Material Balance, etc...).

INDICATE THE SPECIFIC NAME AND CONCENTRATION FOR THE COMPOUND(S) IN EACH CLASS LISTED ABOVE (16-27) THAT HAVE A CONCENTRATION LESS THAN 1

Compound	Concentration (mg/kg)
Phosphorous	3,400
Phenol	-0.5
PCB	-0.5

12/06/81

Analytic & Biological
Laboratories, Inc.

29079 FORD ROAD ■ GARDEN CITY, MICHIGAN 48135 ■ PHONE: (313) 422-7474

December 3, 1981

Unistrut Corporation
35660 Clinton
Wayne, MI 48184
Attn: Mr. Hiem

Gentlemen,

Enclosed please find results for samples submitted March 25, 1981, P.O.# 17307. Samples; Sludge E-4328, Paint Sludge D-4329, and Wastewater E-4327 were tested under the guidelines of the Environmental Protection Agency, and the Department of Natural Resources.

If you have any questions please do hesitate to call me at the above number.

Yours very truly,

Francis B. McLaughlin, FIAC
Director of Laboratories

FBM/ns
cc;files

PLATING SLUDGE - F006
Test 1

IGNITABILITY

Sample Flash Point

Definition- - - -Identifies wastes that pose a fire hazard due to being ignitable under routine storage, disposal and transportation. Fires not only present an immediate danger due to heat and smoke, but they can also spread harmful particles over wide spread areas.

Non-Ignitable

It is a liquid, other than an aqueous solution containing less than 24 percent alcohol by volume, and has a flash point less than 60°C (140°F), as determined by a Pensky-Martens Closed Cup Tester, using the test method specified in ASTM Standard D-93-79.

CORROSIVITY

Sample Corrosivity

Definition- - - -Identifies wastes which require special containers and handling because of their ability to corrode standard materials, require segregation from other wastes because of their ability to dissolve toxic contaminants or destroy human or animal tissue in the event of inadvertant contact.

pH 8 units

It is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5.

Non-Corrosive

It is a liquid and corrodes steel (SAE 1020 at a rate greater than 6.35mm (0.250 inch) per year at a test temperature of 55°C (130°F).

REACTIVITY

Sample Reactivity

Definition- - - -Identifies wastes that tend to react spontaneously, to react vigorously with air or water, to be unstable to shock or heat, to generate toxic gases or to explode.

Non-Reactive

Unstable- water reactant, forms explosive mixtures, generates toxic gases, explosive.

SAMPLE IDENTIFICATION: Sludge E-4328

EXTRACTION PROCEDURE (EP) TOXICITY

Definition- - -Identifies a waste whose constituents have a tendancy to leach or migrate when disposed of in an improperly designed sanitary landfill.

A solid waste exhibits the characteristic of EP Toxicity if the extract obtained from a representative sample of the waste is analyzed and is found to exceed the threshold levels established for the following elements:

Contaminant	Max. Concentration (ppm)	Concentration Found (ppm)
Arsenic	5.0	-0.05
Barium	100.0	-1.0
Cadmium	1.0	-0.05
Chromium	5.0	0.76
Lead	5.0	-0.50
Mercury	0.2	-0.02
Selenium	1.0	0.012
Silver	5.0	-0.05
Endrin (1,2,3,4,10,10-Hexachloro-1 7-epoxy-1,4,4a,5,6,7,8,8a octahydro-1 4-endo, endo-5,8-dimethanonaphthalene)	0.02	-0.02
Lindane (1,2,3,4,5,6,-) Hexachlorocyclohexane,gamma isomer	0.4	-0.1
Methoxychlor (1,1,1-Trichloro-2,2-bis (p·methoxyphenyl) ethane)	10.0	-0.1
Toxaphene ($C_{10}H_{10}Cl_8$-Technical chlorinated camphene, 67-69 percent chlorine)	0.5	-0.1
2,4,·D (2,4-Dichlorophenoxyacetic acid)	10.0	-0.1
2,4,5-TP (Silvex) (2,4,5-Trichlorophenoxypropionic acid)	1.0	-0.1

SAMPLE IDENTIFICATION: Sludge E-4328

SLUDGE E-4328	(ppm)
Lead	22
Zinc	3,940
Nickel	9.75
Copper	0.93
Mercury	0.034
Beryllium	-0.5
Cadmium	-0.1
Trivalent Chromium	570
Hexavalent Chromium	450
Chlorine	N/A
Bromine	N/A
Arsenic	-0.1
Phosphorous	3,300
Sulfur	2,408
Cyanide	-0.5
PCB	-0.5
Phenol	1.2
Noncombustible Ash	17.20 (%)

PLATING SLUDGE - F006

SLUDGE E-4328

GENERATOR WASTE ANALYSIS FORM

LOG NO. _____

WASTE GENERATOR GENERATOR NO. MID098628584

Name: Unistrut Div. of GTE

Address: 4118 S. Wayne Rd

City: Wayne Zip: 48184

Phone: 721-4040 Date: _____

Contact Person: Ron Herman

Signature: Ron Herman

WASTE HAULER *HAULER NO. MID 050598390

Co. Name: American Waste

Address: 44141 Yost Rd

City: Belleville Zip: 48111

DISPOSAL METHOD & FACILITY TO BE USED

__Incineration X Landfill __Reclaimed

__Other (explain): _____

FACILITY NO: MID048090633 Tel: 699-2200

Name: Wayne Disposal Site 2

Address: 49350 N. Service Dr

City: Belleville Zip: 48111

PHYSICAL STATE @ 25°C (circle one)

☒ Solid: Dusting hazard if containers are opened? _____

☐ Liquid/Sludges: ____ % solid ____ pH
Waste can be pumped? ____ poured? ____

☐ Liquid/Solid Phases: ____% solid
____% free flowing liquid layer

☐ Gases: Pressure of container ____PSIG

___ EP Leacnate extraction attacned.
___ Flammable: ___ Flash Point. ___ pH
___ Chemically reactive _____
___ Toxic ___ Corrosive ___ Irritant
___ Odor ___ Explosive ___ Infectious
___ Volatility (if greater than acetone)
Other: _____

GENERAL DESCRIPTION OF WASTE AND PROCESS GENERATING WASTE

_____

_____

_____

VOLUME OF WASTE MATERIAL & CONTAINMENT

_____Gallons _____Cubic yards. Container:
_____bulk. Other _____

HAULED: ___times per ___ week ___ month
___ year. ___ Only hauled once.

*Attach supplemental sheet if needed

IDENTIFY MAJOR COMPONENTS: 1% (10,000 mg/kg) or greater of waste content. Total major and minor components must add up to 100%.

Compound or Element	Concentration
Solids	100 %

MINOR COMPONENTS: Concentration in mg/kg, mg/l or ppm, of waste con[illegible] (Element and/or Compound).

INORGANIC METALS:

1. 22	Lead	5. 0.034	Mercury
2. 3,940	Zinc	6. -0.5	Beryllium
3. 9.75	Nickel	7. -0.1	Cadmium
4. 0.93	Copper	8. 570	Trivalent Chromium
		9. 450	Hexavalent Chromium

INORGANIC NON-METALS:

10. N/A	Chlorine	13. 3,300	Phosphorus
11. N/A	Bromine	14. 2,408	Sulfur
12. -0.1	Arsenic	15. -0.5	Cyanide
16. 17.20 %	Noncombustible Ash		

DOES THE WASTE MATERIAL CONTAIN ANY OF THE FOLLOWING:

Class of Compound	Yes	No
16. Halogenated aromatics (e.g. PCB, PBB)	___	X
17. Other Halogenated organics	___	X
18. Aromatic Amines	___	X
19. Pesticides	___	X
20. Aromatic Ureas or Thioureas	___	X
21. Cyclic Nitrogen (toxic) (e.g. Pyridine)	___	X
22. Phenols, to include nitro & halogenated phenols & salt	X	___
23. Quinones	___	X
24. Phosphorus compounds (e.g. phosphates)	X	___
25. Polycyclic organics	___	X
26. Asbestos	___	X
27. Any other material listed on Mi. Critical Materials Reg.	___	X

NOTE:
State what methods were utilized to derive the data for major and minor compounds (Analysis, Material Balance, etc...).

INDICATE THE SPECIFIC NAME AND CONCENTRATION FOR THE COMPOUND(S) IN EACH CLASS LISTED ABOVE (16-27) THAT HAVE A CONCENTRATION LESS THAN 1%

Compound	Concentration (mg/kg)
PCB	-0.5 ppm
Phenol	1.2 "
Phosphorous	3,300 "

RECEIVED

Test #3

Analytic & Biological
Laboratories, Inc.

29079 FORD ROAD ■ GARDEN CITY, MICHIGAN 48135 ■ PHONE: (313) 422-7474

REPORT OF ANALYSIS

DATE Dec. 2, 1981

SUBMITTED BY: Unistrut Corporation
35660 Clinton
Wayne, MI 48184
Attn: Mr. Herman

DATE RECEIVED: November 18, 1981

A.B.L. NUMBER: 120281-02 P.O.# 19220

ANALYSIS REQUESTED: One (1) sample submitted for EPA Hazardous Waste Testing Program

METHOD OF ANALYSIS: "EPA Office of Water & Waste Management, Washington, D.C. 20460 SW-846, 1980"
"Test Methods for Evaluating Solid Waste". Physical/Chemical Methods.

RESULTS:

3 Platter Sludge 11/12/81

- denotes a quantity of "less than"

See attached sheets.

ANALYTIC & BIOLOGICAL LABORATORIES, INC.

Francis B. McLaughlin, FAIC
Director of Laboratories

FBM/ns
cc.files

IGNITABILITY

Definition:

Identifies wastes that pose a fire hazard due to being ignitable under routine storage, disposal and transportation. Fires not only present an immediate danger due to heat and smoke, but they can also spread harmful particles over wide-spread areas.

It is a liquid, other than an aqueous solution containing less than 24 percent alcohol by volume, and has a flash point less than 60°C (140°F), as determined by a Pensky-Martens Closed Cup Tester, using the test method specified in ASTM Standard D-93-79.

Sample Flash Point

Non-Ignitable

CORROSIVITY

Definition:

Identifies wastes which require special containers and handling because of their ability to corrode standard materials, require segregation from other wastes because of their ability to dissolve toxic contaminants or destroy human or animal tissue in the event of inadvertant contact.

It is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5.

It is a liquid and corrodes steel (SAE 1020 at a rate greater than 6.35mm (0.250 inch) per year at a test temperature of 55°C (130°F).

Sample Corrosivity

pH 7.0 units

Non-Corrosive

REACTIVITY

Definition:

Identifies waste that tend to react spontaneously, to react vigorously with air or water, to be unstable to shock or heat, to generate toxic gases or to explode.

Unstable - water reactant, forms explosive mixtures, generates toxic gases, explosive.

Sample Reactivity

Non-Reactive

SAMPLE IDENTIFICATION: # 3 Platter Sludge 11/12/81

EXTRACTION PROCEDURE (EP) TOXICITY

Definition- - -Identifies a waste whose constituents have a tendancy to leach or migrate when disposed of in an improperly designed sanitary landfill.

A solid waste exhibits the characteristic of EP Toxicity if the extract obtained from a representative sample of the waste is analyzed and is found to exceed the threshold levels established for the following elements:

Contaminant	Max. Concentration (ppm)	Concentration Found (ppm)
Arsenic	5.0	-0.01
Barium	100.0	0.39
Cadmium	1.0	-0.05
Copper	100	-0.10
Chromium	5.0	-0.10
Cyanide	20	-0.05
Lead	5.0	-0.50
Mercury	0.2	-0.01
Selenium	1.0	-0.01
Silver	5.0	-0.05
Zinc	500.0	1.00
Endrin (1,2,3,4,10,10-Hexachloro-1 7-epoxy-1,4,4a,5,6,7,8,8a octahydro-1 4-endo, endo-5,8-dimethanonaphthalene)	0.02	-0.02
Lindane (1,2,3,4,5,6,-) Hexachlorocyclohexane,gamma isomer	0.4	-0.1
Methoxychlor (1,1,1-Trichloro-2,2-bis (p·methoxyphenyl) ethane)	10.0	-0.1
Toxaphene ($C_{10}H_{10}C1_{8,}$-Technical chlorinated camphene, 67-69 percent chlorine)	0.5	-0.1
2,4,·D (2,4-Dichlorophenoxyacetic acid)	10.0	-0.1
2,4,5-TP (Silvex) (2,4,5-Trichlorophenoxypropionic acid)	1.0	-0.1

3 Platter Sludge 11/12/81

SAMPLE IDENTIFICATION:

3 PLATTER SLUDGE 11/12/81

Parameter	(ppm)
Lead	24
Zinc	8,160
Nickel	95
Copper	26.8
Mercury	-0.1
Beryllium	-0.1
Cadmium	1.14
Chromium (Tri)	2,080
Chromium (Hex)	-0.5
Chlorine	N/A
Bromine	N/A
Arsenic	-0.1
Phosphorous	1,040
Sulfur	5,900
Cyanide	-0.1
Noncombustible Ash	17.70 (%)
Phenol	-0.5
PCB	-0.5

ANALYTIC & BIOLOGICAL LABORATORIES, INC.

3 latter Sludge

GENERATOR WASTE ANALYSIS FORM

LOG NO. _____

WASTE GENERATOR GENERATOR NO. MID098628454

Name: Unistruct Div of GTE

Address: 4118 S. Wayne Rd

City: Wayne Zip: 48184

Phone: 721-4040 Ext 325 Date: 12/2/81

Contact Person: JAMES C HEIM

Signature: James C Heim

WASTE HAULER *HAULER NO. _____

Co. Name: _____

Address: _____

City: _____ Zip: _____

DISPOSAL METHOD & FACILITY TO BE USED

__Incineration __Landfill __Reclaimed

__Other (explain): _____

FACILITY NO: _____ Tel: _____

Name: _____

Address: _____

City: _____ Zip: _____

PHYSICAL STATE @ 25°C (circle one)

☒ Solid: Dusting hazard if containers are opened? No

☐ Liquid/Sludges: ____ % solid ____ pH
Waste can be pumped? ____ poured? ____

☐ Liquid/Solid Phases: ____ % solid
____ % free flowing liquid layer

☐ Gases: Pressure of container ____ PSIG

___ EP Leacnate extraction attacned.
___ Flammable: ___ Flash Point. ___ pH
___ Chemically reactive _____
___ Toxic ___ Corrosive ___ Irritant
___ Odor ___ Explosive ___ Infectious
___ Volatility (if greater than acetone)
Other: _____

GENERAL DESCRIPTION OF WASTE AND PROCESS GENERATING WASTE

_____

_____

_____

VOLUME OF WASTE MATERIAL & CONTAINMENT

____ Gallons ____ Cubic yards. Container:
____ bulk. Other _____

HAULED: ___ times per ___ week ___ month
___ year. ___ Only hauled once.

*Attach supplemental sheet if needed.

(See #4 Inst Over) July 28, 1980

IDENTIFY MAJOR COMPONENTS: 1% (10,000 mg/kg) or greater of waste content. Total major and minor components must add up to 100%.

Compound or Element	Concentration
Solids	100%

MINOR COMPONENTS: Concentration in mg/kg, mg/ or ppm, of waste con[illegible] (Element and/or Compound).

INORGANIC METALS:

1.	24	Lead	5.	-0.1	Mercury
2.	8,160	Zinc	6.	-0.1	Beryllium
3.	95	Nickel	7.	1.14	Cadmium
4.	26.8	Copper	8.	2,080	Trivalent Chromium
			9.	-0.5	Hexavalent Chromium

INORGANIC NON-METALS:

10.	N/A	Chlorine	13.	1,040	Phosphorus
11.	N/A	Bromine	14.	5,900	Sulfur
12.	-0.1	Arsenic	15.	-0.1	Cyanide
16.	17.70%	Noncombustible Ash			

DOES THE WASTE MATERIAL CONTAIN ANY OF THE FOLLOWING:

Class of Compound	Yes	No
16. Halogenated aromatics (e.g. PCB, PBB)	___	X
17. Other Halogenated organics	___	X
18. Aromatic Amines	___	X
19. Pesticides	___	X
20. Aromatic Ureas or Thioureas	___	X
21. Cyclic Nitrogen (toxic) (e.g. Pyridine)	___	X
22. Phenols, to include nitro & halogenated phenols & salt	___	X
23. Quinones	X	___
24. Phosphorus compounds (e.g. phosphates)	___	X
25. Polycyclic organics	___	X
26. Asbestos	___	X
27. Any other material listed on Mi. Critical Materials Reg.	___	X

NOTE:
State what methods were utilized to derive t data for major and minor compounds (Analysis Material Balance, etc...).

INDICATE THE SPECIFIC NAME AND CONCENTRATION FOR THE COMPOUND(S) IN EACH CLASS LISTED ABO (16-27) THAT HAVE A CONCENTRATION LESS THAN

Compound	Concentration (mg/kg)
PCB	-0.5
Phenol	-0.5
Phosphorous	1,040

Test 2

Analytic & Biological
Laboratories, Inc.

29079 FORD ROAD ■ GARDEN CITY, MICHIGAN 48135 ■ PHONE: (313) 422-7474

REPORT OF ANALYSIS

DATE Nov.9, 1981

SUBMITTED BY: Unistrut Corporation
35660 Clinton
Wayne, MI 48184
Attn: Mr. Herman

DATE RECEIVED: October 29, 1981

A.B.L. NUMBER: 110981-71 P.O.# 19051

ANALYSIS REQUESTED: One (1) sample submitted for EPA Hazardous Waste.

METHOD OF ANALYSIS: "EPA Office of Water & Waste Management, Washinton, D.C. 20460 SW-846, 1980". "Test Methods for Evaluating Solids Waste". Physical / Chemical Methods.

RESULTS:

See attached sheets.

- denotes a quantity of "less than"

ANALYTIC & BIOLOGICAL LABORATORIES, INC.

Francis B. McLaughlin, FAIC
Director of Laboratories

FBM/ns
cc:files

RECEIVED 12/09/81

IGNITABILITY

Sample Flash Point

Definition- - - -Identifies wastes that pose a fire hazard due to being ignitable under routine storage, disposal and transportation. Fires not only present an immediate danger due to heat and smoke, but they can also spread harmful particles over wide spread areas.

Non - Ignitable

It is a liquid, other than an aqueous solution containing less than 24 percent alcohol by volume, and has a flash point less than 60° C (140° F), as determined by a Pensky-Martens Closed Cup Tester, using the test method specified in ASTM Standard D-93-79.

CORROSIVITY

Sample Corrosivity

Definition- - - -Identifies wastes which require special containers and handling because of their ability to corrode standard materials, require segregation from other wastes because of their ability to dissolve toxic contaminants or destroy human or animal tissue in the event of inadvertant contact.

pH 7.0 units

Non-Corrosivity

It is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5.

It is a liquid and corrodes steel (SAE 1020 at a rate greater than 6.35mm (0.250 inch) per year at a test temperature of 55° C (130° F).

REACTIVITY

Sample Reactivity

Definition- - - -Identifies wastes that tend to react spontaneously, to react vigorously with air or water, to be unstable to shock or heat, to generate toxic gases or to explode.

Non-Reactive

Unstable- water reactant, forms explosive mixtures, generates toxic gases, explosive.

SAMPLE IDENTIFICATION: Plater Sludge - Napco Plater

EXTRACTION PROCEDURE (EP) TOXICITY

Definition- - -Identifies a waste whose constituents have a tendancy to leach or migrate when disposed of in an improperly designed sanitary landfill.

A solid waste exhibits the characteristic of EP Toxicity if the extract obtained from a representative sample of the waste is analyzed and is found to exceed the threshold levels established for the following elements:

Contaminant	Max. Concentration (ppm)	Concentration Found (ppm)
Arsenic	5.0	-0.01
Barium	100.0	0.045
Cadmium ✓	1.0	-0.010
Copper	100	-0.010
Chromium ✓	5.0	-0.045
Cyanide ✓	20	-0.05
Lead	5.0	0.257
Mercury	0.2	-0.001
Selenium	1.0	-0.033
Silver	5.0	0.093
Zinc	500.0	0.418
Endrin (1,2,3,4,10,10-Hexachloro-1 7-epoxy-1,4,4a,5,6,7,8,8a octahydro-1 4-endo, endo-5,8-dimethanonaphthalene)	0.02	-0.02
Lindane (1,2,3,4,5,6,-) Hexachlorocyclohexane, gamma isomer	0.4	-0.1
Methoxychlor (1,1,1-Trichloro-2,2-bis (p·methoxyphenyl) ethane)	10.0	-0.1
Toxaphene ($C_{10}H_{10}Cl_{8}$-Technical chlorinated camphene, 67-69 percent chlorine)	0.5	-0.1
2,4,·D (2,4-Dichlorophenoxyacetic acid)	10.0	-0.1
2,4,5-TP (Silvex) (2,4,5-Trichlorophenoxypropionic acid)	1.0	-0.1

SAMPLE IDENTIFICATION: Plater Sludge - Napco Plater

GENERATOR WASTE ANALYSIS FORM

LOG NO. _____

WASTE GENERATOR

GENERATOR NO. _____

Name: _____

Address: _____

City: _____ Zip: _____

Phone: _____ Date: _____

Contact Person: _____

Signature: _____

WASTE HAULER

*HAULER NO. _____

Co. Name: _____

Address: _____

City: _____ Zip: _____

DISPOSAL METHOD & FACILITY TO BE USED

__Incineration __Landfill __Reclaimed

__Other (explain): _____

FACILITY NO: _____ Tel: _____

Name: _____

Address: _____

City: _____ Zip: _____

PHYSICAL STATE @ 25°C (circle one)

☒ Solid: Dusting hazard if containers are opened? No

☐ Liquid/Sludges: ____ % solid ____ pH
Waste can be pumped? ____ poured? ____

☐ Liquid/Solid Phases: ____ % solid
____ % free flowing liquid layer

☐ Gases: Pressure of container ____ PSIG

_X_ EP Leachate extraction attached.

___ Flammable: ___ Flash Point. ___ pH

___ Chemically reactive _____

___ Toxic ___ Corrosive ___ Irritant

___ Odor ___ Explosive ___ Infectious

___ Volatility (if greater than acetone)

Other: _____

GENERAL DESCRIPTION OF WASTE AND PROCESS GENERATING WASTE

_____

_____

_____

VOLUME OF WASTE MATERIAL & CONTAINMENT

__ __Gallons ____Cubic yards. Container:
____bulk. Other _____

HAULED: ___times per ___ week ___ month
___ year. ____ Only hauled once.

*Attach supplemental sheet if needed.

IDENTIFY MAJOR COMPONENTS: 1% (10,000 mg/kg) or greater of waste content. Total major and minor components must add up to 100%.

Compound or Element	Concentration
Solids	100%

MINOR COMPONENTS: Concentration in mg/kg, mg/ or ppm of waste con[illegible] (Element and/or Compound).

INORGANIC METALS:

1. 71.42 Lead
2. 2190 Zinc
3. 03.20 Nickel
4. 21.90 Copper
5. -0.001 Mercury
6. -0.01 Beryllium
7. 09.76 Cadmium
8. 208.0 Trivalent Chromium
9. 21 Hexavalent Chromium

INORGANIC NON-METALS:

10. N/A Chlorine
11. N/A Bromine
12. 0.01 Arsenic
13. 2,900 Phosphorus
14. 2,467 Sulfur
15. -0.1 Cyanide
16. 16.59% Noncombustible Ash

DOES THE WASTE MATERIAL CONTAIN ANY OF THE FOLLOWING:

Class of Compound	Yes	No
16. Halogenated aromatics (e.g. PCB, P88)	___	X
17. Other Halogenated organics	___	X
18. Aromatic Amines	___	X
19. Pesticides	___	X
20. Aromatic Ureas or Thioureas	___	X
21. Cyclic Nitrogen (toxic) (e.g. Pyridine)	___	X
22. Phenols, to include nitro & halogenated phenols & salt	___	X
23. Quinones	___	X
24. Phosphorus compounds (e.g. phosphates)	X	___
25. Polycyclic organics	___	X
26. Asbestos	___	X
27. Any other material listed on Mi. Critical Materials Reg.	___	X

NOTE:
State what methods were utilized to derive the data for major and minor compounds (Analysis, Material Balance, etc...).

INDICATE THE SPECIFIC NAME AND CONCENTRATION FOR THE COMPOUND(S) IN EACH CLASS LISTED ABOVE (16-27) THAT HAVE A CONCENTRATION LESS THAN 1%

Compound	Concentration (mg/kg)
Phosphorous	2,900
~~PCB~~	~~0.5~~
~~Phenol~~	~~0.5~~

RECEIVED 12/09/81

Test #3

Analytic & Biological
Laboratories, Inc.

29079 FORD ROAD ■ GARDEN CITY, MICHIGAN 48135 ■ PHONE: (313) 422-7474

REPORT OF ANALYSIS

DATE Dec. 2, 1981

SUBMITTED BY: Unistrut Corporation
35660 Clinton
Wayne, MI 48184
Attn: Mr. Herman

DATE RECEIVED: November 18, 1981

A.B.L. NUMBER: 120281-02 P.O.# 19220

ANALYSIS REQUESTED: One (1) sample submitted for EPA Hazardous Waste Testing Program

METHOD OF ANALYSIS: "EPA Office of Water & Waste Management, Washington, D.C. 20460 SW-846, 1980"
"Test Methods for Evaluating Solid Waste". Physical/Chemical Methods.

RESULTS:

3 Platter Sludge 11/12/81

- denotes a quantity of "less than"

See attached sheets.

ANALYTIC & BIOLOGICAL LABORATORIES, INC.

Francis B. McLaughlin, FAIC
Director of Laboratories

FBM/ns
cc.files

RECEIVED 12/09/81

CERTIFIED LABORATORY – U.S. DEPARTMENT OF AGRICULTURE
U.S. DRUG ENFORCEMENT ADMINISTRATION
UNITED STATES FOOD AND DRUG ADMINISTRATION
UNITED STATES NUCLEAR REGULATORY COMMISSION
AMERICAN COUNCIL OF INDEPENDENT LABORATORIES
INSTITUTE OF FOOD TECHNOLOGISTS

FELLOW – AMERICAN INSTITUTE OF CHEMISTS
DIPLOMAT – AMERICAN BOARD OF BIOANALYSTS
AMERICAN CHEMICAL SOCIETY
AMERICAN SOCIETY FOR MICROBIOLOGY
AMERICAN ASSOCIATION FOR THE ADVANCEMENT OF SCIENCE
ASSOCIATION OF OFFICIAL ANALYTICAL CHEMISTS

IGNITABILITY

Definition:

Identifies wastes that pose a fire hazard due to being ignitable under routine storage, disposal and transportation. Fires not only present an immediate danger due to heat and smoke, but they can also spread harmful particles over wide-spread areas.

It is a liquid, other than an aqueous solution containing less than 24 percent alcohol by volume, and has a flash point less than 60°C (140°F), as determined by a Pensky-Martens Closed Cup Tester, using the test method specified in ASTM Standard D-93-79.

Sample Flash Point

Non-Ignitable

CORROSIVITY

Definition:

Identifies wastes which require special containers and handling because of their ability to corrode standard materials, require segregation from other wastes because of their ability to dissolve toxic contaminants or destroy human or animal tissue in the event of inadvertant contact.

It is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5.

It is a liquid and corrodes steel (SAE 1020 at a rate greater than 6.35mm (0.250 inch) per year at a test temperature of 55°C (130°F).

Sample Corrosivity

pH 7.0 units

Non-Corrosive

REACTIVITY

Definition:

Identifies waste that tend to react spontaneously, to react vigorously with air or water, to be unstable to shock or heat, to generate toxic gases or to explode.

Unstable - water reactant, forms explosive mixtures, generates toxic gases, explosive.

Sample Reactivity

Non-Reactive

SAMPLE IDENTIFICATION: # 3 Platter Sludge 11/12/81

EXTRACTION PROCEDURE (EP) TOXICITY

Definition- - -Identifies a waste whose constituents have a tendancy to leach or migrate when disposed of in an improperly designed sanitary landfill.

A solid waste exhibits the characteristic of EP Toxicity if the extract obtained from a representative sample of the waste is analyzed and is found to exceed the threshold levels established for the following elements:

Contaminant	Max. Concentration (ppm)	Concentration Found (ppm)
Arsenic	5.0	-0.01
Barium	100.0	0.39
Cadmium	1.0	-0.05
Copper	100	-0.10
Chromium	5.0	-0.10
Cyanide	20	-0.05
Lead	5.0	-0.50
Mercury	0.2	-0.01
Selenium	1.0	-0.01
Silver	5.0	-0.05
Zinc	500.0	1.00
Endrin (1,2,3,4,10,10-Hexachloro-1 7-epoxy-1,4,4a,5,6,7,8,8a octahydro-1 4-endo, endo-5,8-dimethanonaphthalene)	0.02	-0.02
Lindane (1,2,3,4,5,6,-) Hexachlorocyclohexane,gamma isomer	0.4	-0.1
Methoxychlor (1,1,1-Trichloro-2,2-bis (p·methoxyphenyl) ethane)	10.0	-0.1
Toxaphene ($C_{10}H_{10}C1_8$-Technical chlorinated camphene, 67-69 percent chlorine)	0.5	-0.1
2,4,·D (2,4-Dichlorophenoxyacetic acid)	10.0	-0.1
2,4,5-TP (Silvex) (2,4,5-Trichlorophenoxypropionic acid)	1.0	-0.1

SAMPLE IDENTIFICATION: # 3 Platter Sludge 11/12/81

3 PLATTER SLUDGE 11/12/81

Parameter	(ppm)
Lead	24
Zinc	8,160
Nickel	95
Copper	26.8
Mercury	-0.1
Beryllium	-0.1
Cadmium	1.14
Chromium (Tri)	2,080
Chromium (Hex)	-0.5
Chlorine	N/A
Bromine	N/A
Arsenic	-0.1
Phosphorous	1,040
Sulfur	5,900
Cyanide	-0.1
Noncombustible Ash	17.70 (%)
Phenol	-0.5
PCB	-0.5

ANALYTIC & BIOLOGICAL LABORATORIES, INC.

Platter Sludge

GENERATOR WASTE ANALYSIS FORM

LOG NO. _____

WASTE GENERATOR GENERATOR NO. MID098628584

Name: Holstart Div of GTE

Address: 4118 S. Wayne Rd.

City: Wayne Zip: 48184

Phone: 721-4040 Ext 325 Date: 12/2/81

Contact Person: JAMES C. HEIM

Signature: James C. Heim

WASTE HAULER *HAULER NO. _____

Co. Name: _____

Address: _____

City: _____ Zip: _____

DISPOSAL METHOD & FACILITY TO BE USED

__Incineration __Landfill __Reclaimed

__Other (explain): _____

FACILITY NO: _____ Tel: _____

Name: _____

Address: _____

City: _____ Zip: _____

PHYSICAL STATE @ 25°C (circle one)

☒ Solid: Dusting hazard if containers are opened? No

☐ Liquid/Sludges: ____ % solid ____ pH
Waste can be pumped? ____ poured? ____

☐ Liquid/Solid Phases: ____ % solid
____ % free flowing liquid layer

☐ Gases: Pressure of container ____ PSIG

___ EP Leacnate extraction attacned.
___ Flammable: ___ Flash Point. ___ pH
___ Chemically reactive _____
___ Toxic ___ Corrosive ___ Irritant
___ Odor ___ Explosive ___ Infectious
___ Volatility (if greater than acetone)
Other: _____

GENERAL DESCRIPTION OF WASTE AND PROCESS GENERATING WASTE

_____

_____

_____

VOLUME OF WASTE MATERIAL & CONTAINMENT

____ Gallons ____ Cubic yards. Container:
____ bulk. Other _____

HAULED: ___ times per ___ week ___ month
___ year. ___ Only hauled once.

*Attach supplemental sheet if needed.

(See #4 Inst. Over) July 28, 1980

IDENTIFY MAJOR COMPONENTS: 1% (10,000 mg/kg) or greater of waste content. Total major and minor components must add up to 100%.

Compound or Element	Concentration
Solids	100%

MINOR COMPONENTS: Concentration in mg/kg, mg/ or ppm, of waste con:ent (Element and/or Compound).

INORGANIC METALS:

1.	24	Lead	5.	-0.1	Mercury
2.	8,160	Zinc	6.	-0.1	Beryllium
3.	95	Nickel	7.	1.14	Cadmium
4.	26.8	Copper	8.	2,080	Trivalent Chromium
			9.	-0.5	Hexavalent Chromium

INORGANIC NON-METALS:

10.	N/A	Chlorine	13.	1,040	Phosphorus
11.	N/A	Bromine	14.	5,900	Sulfur
12.	-0.1	Arsenic	15.	-0.1	Cyanide
16.	17.70%	Noncombustible Ash			

DOES THE WASTE MATERIAL CONTAIN ANY OF THE FOLLOWING:

Class of Compound	Yes	No
16. Halogenated aromatics (e.g. PCB, PBB)	___	X
17. Other Halogenated organics	___	X
18. Aromatic Amines	___	X
19. Pesticides	___	X
20. Aromatic Ureas or Thioureas	___	X
21. Cyclic Nitrogen (toxic) (e.g. Pyridine)	___	X
22. Phenols, to include nitro & halogenated phenols & salt	___	X
23. Quinones	X	___
24. Phosphorus compounds (e.g. phosphates)	___	X
25. Polycyclic organics	___	X
26. Asbestos	___	X
27. Any other material listed on Mi. Critical Materials Reg.	___	X

NOTE:
State what methods were utilized to derive t data for major and minor compounds (Analysis Material Balance, etc...).

INDICATE THE SPECIFIC NAME AND CONCENTRATION FOR THE COMPOUND(S) IN EACH CLASS LISTED ABO (16-27) THAT HAVE A CONCENTRATION LESS THAN

Compound	Concentration (mg/kg)
PCB	-0.5
Phenol	-0.5
Phosphorous	1,040

RECEIVED 12/09/81

A.4 Closure/ Post-Closure

GTE Service Corporation
One Stamford Forum
Stamford, CT 06904
203 965-2000

March 28, 1984

Mr. Thomas B. Golz
Waste Management Branch - Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Hazardous Waste Closure & Post-Closure Care

The attached letter from Timothy Murphy, Vice President-Controller of GTE Products of Connecticut Corporation is being filed with you in accordance with Parts 264 and 265 of Title 40 of the code of Federal Regulations.

Respectfully submitted,

James H. Doherty

James H. Doherty
Manager - Corporate Insurance
Insurance & Pensions Department

Attachment

JHD:bdt

March 28, 1984

GTE Products of Connecticut Corporation
One Stamford Forum
Stamford, Connecticut 06904
203 965-2000

Mr. Thomas B. Golz, Waste Management Branch - Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Golz:

I am the chief financial officer of GTE Products of Connecticut Corporation, One Stamford Forum, Stamford, Connecticut 06904. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1) This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: None.

2) This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: See Attachment C.

3) In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: See Attachment D.

4) This firm is the owner or operator of the following hazardous waste management facilities for which assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: See Attachment E.

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1983. See Attachment A.

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

Timothy P. Murphy
Vice President-Controller

Dated March 28, 1984

(NR file) MID 098 678 584

GTE

GTE Service Corporation
One Stamford Forum
Stamford, CT 06904
203 965-2000

March 28, 1985

Mr. Thomas B. Golz, Waste Management Branch - Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Hazardous Waste Closure & Post-Closure Care

Dear Mr. Golz:

The attached letter from Dorick V. Mauro, Vice President-Controller of GTE Products of Connecticut Corporation is being filed with you in accordance with Parts 264 and 265 of Title 40 of the code of Federal Regulations.

Respectfully submitted,

James H. Doherty

James H. Doherty
Manager - Corporate Insurance
Insurance & Pensions Department

JHD:cak

Att.

GTE Products of
Connecticut Corporation
One Stamford Forum
Stamford, Connecticut 06904
203 965-2000

March 28, 1985

Mr. Thomas B. Golz, Waste Management Branch - Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Golz:

I am the chief financial officer of GTE Products of Connecticut Corporation, One Stamford Forum, Stamford, Connecticut 06904. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1) This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: None.

2) This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: See Attachment C.

3) In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: See Attachment D.

4) This firm is the owner or operator of the following hazardous waste management facilities for which assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: See Attachment E.

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1984. See Attachment A.

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

Dorick V. Mauro
Vice President-Controller

Dated March 28, 1985

GTE PRODUCTS OF CONNECTICUT CORPORATION

FINANCIAL ASSURANCE FOR CLOSURE AND POST-CLOSURE COSTS

ATTACHMENT "A" - ALTERNATIVE I

		As of 12/31/84 (In Thousands)	
*1)	Sum of Closure and Post-Closure Cost Estimates (See Attachment "A")	$ 2,803	
*2)	Total Liabilities	$ 1,816,773	
*3)	Tangible Net Worth	$ 1,388,588	
*4)	Net Worth	$ 1,392,644	
*5)	Current Assets	$ 2,268,252	
*6)	Current Liabilities	$ 1,332,867	
*7)	Net Working Capital (Line 5 minus Line 6)	$ 935,385	
*8)	The Sum of Net Income Plus Depreciation, Depletion and Amortization	$ 204,310	
*9)	Total Assets in United States	$ 2,406,655	
		YES	NO
10)	Is Line 3 at least $10 million?	X	
11)	Is Line 3 at least 6 times Line 1?	X	
12)	Is Line 7 at least 6 times Line 1?	X	
13)	Are at least 90% of Firm's Assets Located in the United States?		X
14)	Is Line 9 at least 6 times Line 1?	X	
15)	Is Line 2 Divided by Line 4 less than 2.0?	X	
16)	Is Line 8 Divided by Line 2 Greater than 0.1?	X	
17)	Is Line 5 Divided by Line 6 Greater than 1.5?	X	

REGION V

ATTACHMENT B

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

SUMMARY

12-31-84

Region I	250,000
Region II	77,000
Region V	23,150
Region IX	78,000
Alabama	509,000
California	40,750
Connecticut	16,000
Illinois	42,000
Indiana	7,000
Kentucky	421,000
Maine	120,000
Massachusetts	152,500
New Hampshire	44,500
New Mexico	60,000
North Carolina	25,000
Pennsylvania	994,400
South Carolina	-0-
Texas	2,500
TOTAL	$2,802,800

0326B

ATTACHMENT C
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

EPA REGION V

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Unistrut Wayne, MI	MID~~067332650~~ X No Number ? 098 678 584 NR	~~20,000~~	Closure
GTE Walmet Royal Oak, MI	MID091605972 MID 054 693 213 N.R	~~3,150~~	Closure
	TOTAL COSTS	$23,150	

ATTACHMENT D
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

EPA REGION I

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Lighting Central Falls, RI	RID001198605	250,000	Closure
	TOTAL COSTS	250,000	

ATTACHMENT D
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

EPA REGION II

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Lighting Fajardo, PR	PRD000692814	15,000	Closure
GTE Precision Mat'ls Gurabo, PR	PRD000692624	20,000	Closure
GTE Gibson Electric Luquillo, PR	PRD090426180	10,000	Closure
GTE Syltron-Exeter Luquillo, PR	PRD000706432	16,000	Closure
GTE Syltron-Towanda Luquillo, PR	N/A	16,000	Closure
	TOTAL COSTS	$77,000	

ATTACHMENT D
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

EPA REGION IX

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Communication Products Henderson, NV	NVT000612176	$ 41,000	Closure
GTE Microcircuits Tempe, AZ	AZD099374407	37,000	Closure
	TOTAL COSTS	$78,000	

ATTACHMENT D
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

ALABAMA

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Business Communications, Huntsville, AL	ALD050166750	$ 477,000 32,000	Closure Post-Closure
	TOTAL COSTS	$509,000	

ATTACHMENT D
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

CALIFORNIA

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Precision Materials Belmont, CA	CAD000107268	$ 25,000	Closure
GTE Sylvania Systems Mountain View, CA	CAD076306836	15,750	Closure
	TOTAL COSTS	$40,750	

ATTACHMENT D
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

CONNECTICUT

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Walmet Naugatuck, CT	CTD010144715	$ 0	Closure
GTE Parts Watertown, CT	CTD060022944	16,000	Closure
	TOTAL COSTS	$16,000	

ATTACHMENT D
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

ILLINOIS

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Communication Systems Genoa, IL	ILD001748003	$ 10,000	Closure
GTE Communication Systems Northlake, IL	ILD005070545	32,000	Closure
	TOTAL COSTS	$42,000	

ATTACHMENT D
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

INDIANA

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Lighting Seymour, IN	IND089273338	7,000	Closure
	TOTAL COSTS	7,000	

ATTACHMENT D
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

KENTUCKY

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Lighting Lamp Plant Tyrone Pike Versaille, KY	KYD006399000	$ 21,000	Closure
GTE Lighting Glass Plant Tyrone Pike Versailles, KY	KYD068339217	375,000	Closure
GTE Lighting 4 E. Washington St. Winchester, KY	KYD990876138	25,000	Closure
GTE American Mine Tool U.S.Highway 41 No. Madisonville, KY	N/A	-0-	Closure
	TOTAL COSTS	$421,000	

ATTACHMENT D
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

MAINE

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Lighting Waterboro, ME	MED067058339	$ 1,000	Closure
GTE Lighting Standish, ME	MED058951047	53,000	Closure/ Post Closure
GTE Lighting Waldoboro, ME	MED001099746	16,000	Closure
GTE Lighting Kezar Falls, ME	MED00840991	50,000	Closure
	TOTAL COSTS	$120,000	

ATTACHMENT E
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

MASSACHUSETTS

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Sylvania Systems Needham, MA	MAD71705222	$ 12,000	Closure
GTE Lighting Boston St. Salem, MA	MAD000846329	5,000	Closure
GTE Lighting Loring Ave. Salem, MA	MAD002249803	20,000	Closure
GTE Communications Prod. 100 First Ave. W ham, MA	MAD076568971	11,500	Closure
GTE Laboratories 40 Sylvan Rd. Waltham, MA	MAD000846303	-0-	Closure
GTE Lighting Endicott St., Danvers, MA	MAD053450730	35,000	Closure
GTE Lighting Sylvan Rd., Danvers, MA	MAD080031180	30,000	Closure
GTE Lighting Fall River, MA	MAD043399989	11,000	Closure
GTE Lighting Ipswich, MA	MAD069348829	10,000	Closure
GTE Laboratories Lexington, MA	MAD000846295	15,000	Closure
GTE Communications Products Winter Street, Waltham, MA	MAD000846311	2,000	Closure

ATTACHMENT E
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

MASSACHUSETTS

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Communications Products Westboro, MA	MAT260010223	$ 0	Closure
GTE Lighting Equipment Development Ipswich, MA	N/A	1,000	Closure
	TOTAL COSTS	$152,500	

ATTACHMENT D
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

NEW HAMPSHIRE

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Lighting Exeter, NH	NHD003941655	$ 22,000	Closure
GTE Lighting Greenland, NH	NHD066755620	-0-	Closure
GTE Lighting Hillsboro, NH	NHD0073984288	1,500	Closure
GTE Lighting Manchester, NH	NHD005574223	21,000	Closure
	TOTAL COSTS	$44,500	

ATTACHMENT D
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

NEW MEXICO

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Lenkurt Albuquerque, NM	NMD056773765	60,000	Closure
	TOTAL COSTS	60,000	

ATTACHMENT D
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

NORTH CAROLINA

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Precision Materials Asheville, NC	NCD056476856	$ 0	Closure
GTE Metal Laminates Reidsville, NC	N/A	25,000	Closure
	TOTAL COSTS	$25,000	

ATTACHMENT E
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

PENNSYLVANIA

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Gibson Electric Delmont, Pa	PAD990825408	$ 100,000	Closure
GTE Lighting Montoursville, PA	PAD003050713	21,000	Closure
GTE Circuit Products Muncy, PA	PAD003050846	230,000	Closure
GTE Lighting St. Mary's PA	PAD002124368	15,000	Closure
GTE Chemical & M llurgical To..anda, PA	PAD003044609	400,000	Closure/ Post-Closure
GTE Parts Wire Plant Warren, PA	PAD002124766	150,000	Closure
GTE Circuit Products Williamsport, PA	PAD000800557	10,000	Closure
GTE Parts York, PA	PAD061107017	64,000	Closure
GTE Lighting Wellsboro, PA	N/A	2,300	Closure
GTE Parts Titusville, PA	N/A	2,100	Closure
	TOTAL COSTS	$994,400	

ATTACHMENT D
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

SOUTH CAROLINA

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Parts Moncks Corner, SC	SCD086376878	-0-	Closure
	TOTAL COSTS	-0-	

ATTACHMENT D
12-31-84

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

TEXAS

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Lenkurt El Paso, TX	TXT000609313	$2,500	Closure
	TOTAL COSTS	$2,500	

ARTHUR ANDERSEN & CO.

STAMFORD, CONNECTICUT

To the Board of Directors and Shareholder of

GTE Products of Connecticut Corporation and Subsidiaries:

We have examined the consolidated balance sheet of GTE Products of Connecticut Corporation and subsidiaries (the "Company") as of December 31, 1984, and the related consolidated statements of income, changes in financial position, amounts paid in, in excess of par value, foreign currency translation adjustment and reinvested earnings for the year then ended and have expressed an unquailified opinion on those statements in our report dated February 5, 1985. We have not performed any auditing procedures since that date. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

At your request, we have read the letter that is dated March 28, 1985, from your chief financial officer that is required by Environmental Protection Agency regulations. As further required by such regulations, we have compared the data set forth in Items 2 to 9 of attachment A to the letter, which have been derived from the audited financial statements as of and for the year ended December 31, 1984, referred to above with the corresponding amounts in such financial statements. In connection with this procedure, no matters came to our attention that caused us to believe that the specified data set forth in Items 2 to 9 should be adjusted.

June 4, 1985.

ARTHUR ANDERSEN & CO.

STAMFORD, CONNECTICUT

To the Board of Directors

GTE Products of Connecticut
Corporation and subsidiaries:

We have examined the consolidated balance sheets of GTE Products of Connecticut Corporation (a Connecticut corporation and a wholly-owned subsidiary of GTE Corporation) and subsidiaries as of December 31, 1984 and 1983 and the related consolidated statements of income, changes in financial position, amounts paid in, in excess of par value, foreign currency translation adjustment and reinvested earnings for the years then ended. Our examinations were made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, the consolidated financial statements referred to above present fairly the financial position of GTE Products of Connecticut Corporation and subsidiaries as of December 31, 1984 and 1983, and the results of their operations and the changes in their financial position for the years then ended, in conformity with generally accepted accounting principles which, except for the change (with which we concur) in the method of accounting for investment tax credits as described in Note 3 to the consolidated financial statements, were applied on a consistent basis (after giving retroactive effect to the exclusion of the Company's finance subsidiary as described in Note 2 to the consolidated financial statements).

Arthur Andersen & Co.

February 5, 1985

ARTHUR ANDERSEN & CO.

STAMFORD, CONNECTICUT

To the Board of Directors:

GTE Products of Connecticut
Corporation and Subsidiaries:

We have examined the consolidated balance sheets of GTE Products of Connecticut Corporation (a Connecticut Corporation and a wholly-owned subsidiary of GTE Corporation) and subsidiaries as of December 31, 1983 and 1982, and the related statements of income, changes in financial position, amounts paid in, in excess of par value, foreign currency translation adjustment and reinvested earnings for the years then ended. Our examinations were made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, the financial statements referred to above present fairly the financial position of GTE Products of Connecticut Corporation and subsidiaries as of December 31, 1983 and 1982, and the results of their operations and the changes in their financial position for the years then ended, in conformity with generally accepted accounting principles applied on a consistent basis.

Arthur Andersen & Co.

February 7, 1984.

ARTHUR ANDERSEN & CO.

STAMFORD, CONNECTICUT

To the Board of Directors and Shareholder of:

GTE Products of Connecticut Corporation:

We have examined the consolidated balance sheet of GTE Products of Connecticut Corporation and subsidiaries (the "Company") as of December 31, 1983, and the related consolidated statements of income, changes in financial position, amounts paid in, in excess of par value, foreign currency translation adjustment and reinvested earnings for the year then ended and have expressed an unqualified opinion on those statements in our report dated February 7, 1984. We have not performed any auditing procedures since that date. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

At your request, we have read the letter dated March 28, 1984, required by EPA regulations. As further required by such regulations, we have compared the data set forth in Items 2 to 8, which have been derived from the independently audited financial statements as of and for the year ended December 31, 1983, referred to above with the corresponding amounts in such financial statements. In connection with this procedure, no matters came to our attention which caused us to believe that the specified data set forth in Items 2 to 8 should be adjusted.

GTE Products of Connecticut Corporation is a nonpublic entity and therefore is not subject to the Requirements of FASB Statement No. 14, "Financial Reporting for Segments of a Business Enterprise," and has not voluntarily elected to comply with that pronouncement. Accordingly, we were unable to, and did not, perform the procedure described in the preceding paragraph with respect to Item 9.

May 16, 1984.

EPA V

GTE PRODUCTS OF CONNECTICUT CORPORATION

FINANCIAL ASSURANCE FOR CLOSURE AND POST-CLOSURE COSTS

ATTACHMENT "A" - ALTERNATIVE I

	As of 12/31/83 (In Thousands)
*1) Sum of Closure and Post-Closure Cost Estimates (See Attachment "A")	$ 2,233
*2) Total Liabilities	$ 2,546,042
*3) Tangible Net Worth	$ 1,803,658
*4) Net Worth	$ 1,815,881
*5) Current Assets	$ 2,925,502
*6) Current Liabilities	$ 1,278,692
*7) Net Working Capital (Line 5 minus Line 6)	$ 1,646,810
*8) The Sum of Net Income Plus Depreciation, Depletion and Amortization	$ 191,996
*9) Total Assets in the United States	$ 3,443,670

	YES	NO
10) Is Line 3 at least $10 million?	X	
11) Is Line 3 at least 6 times Line 1?	X	
12) Is Line 7 at least 6 times Line 1?	X	
13) Are at least 90% of Firm's Assets Located in the United States?		X
14) Is Line 9 at least 6 times Line 1?	X	
15 Is Line 2 Divided by Line 4 less than 2.0?	X	
16) Is Line 8 Divided by Line 2 Greater than 0.1?		X
17) Is Line 5 Divided by Line 6 Greater than 1.5?	X	

0340B

ATTACHMENT B

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

SUMMARY

12-31-83

Region I	50,000
Region II	75,000
Region III	-0-
Region V	20,000
Region VI	60,000
Region IX	47,500
Connecticut	15,000
New Hampshire	41,000
North Carolina	6,000
Alabama	425,000
Mississippi	-0-
South Carolina	-0-
Kentucky	420,000
Illinois	40,500
Indiana	6,000
California	55,000
Texas	7,000
Maine	96,000
Massachusetts	176,000
Pennsylvania	693,000
TOTAL	$2,233,000

0326B

ATTACHMENT D
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

EPA REGION III

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Wiring Hampton, VA	VAD980550628	$ 0*	Closure
	TOTAL COSTS	-0-	

* SOLD

ATTACHMENT D
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

EPA REGION VI

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Lenkurt Albuquerque, NM	NMD056773765	$ 60,000	Closure
	TOTAL COSTS	$60,000	

ATTACHMENT D
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

EPA REGION IX

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Communication Products Henderson, NV	NVT000612176	$ 20,000	Closure
GTE Microcircuits Tempe, AZ	AZD099374407	27,500	Closure
	TOTAL COSTS	$47,500	

ATTACHMENT D
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

CONNECTICUT

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Walmet Naugatuck, CT	CTD010144715	$ 0	Closure
GTE Parts Watertown, CT	CTD060022944	15,000	Closure
	TOTAL COSTS	$15,000	

ATTACHMENT D

12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

NEW HAMPSHIRE

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Lighting Exeter, NH	NHD003941655	$ 20,000	Closure
GTE Lighting Greenland, NH	NHD066755620	-0-	Closure
GTE Lighting Hillsboro, NH	NHD0073984288	1,000	Closure
GTE Lighting Manchester, NH	NHD005574223	20,000	Closure
	TOTAL COSTS	$41,000	

ATTACHMENT D
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

NORTH CAROLINA

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Precision Materials Asheville, NC	NCD056476856	$ 0	Closure
GTE Metal Laminates Reidsville, NC	N/A	6,000	Closure
	TOTAL COSTS	$6,000	

ATTACHMENT D
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

ALABAMA

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Business Communications, Huntsville, AL	ALD050166750	$ 425,000	Closure/ Post-Closur
	TOTAL COSTS	$425,000	

ATTACHMENT D
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

MISSISSIPPI

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Electrical Equipment Jackson, MS	MSD077911899	$ 0*	Closure
	TOTAL COSTS	-0-	

* SOLD

ATTACHMENT D
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

SOUTH CAROLINA

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Electrical Equipment Lancaster, SC	SCD066323452	$ 0*	Closure
GTE Parts Moncks Corner, SC	SCD086376878	0	Closure
GTE Wiring Pageland, SC	N/A	0*	Closure
	TOTAL COSTS	-0-	

* SOLD

ATTACHMENT D
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

KENTUCKY

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Lighting Lamp Plant Versaille, KY	KYD006399000	$ 20,000	Closure
GTE Lighting Glass Plant Versailles, KY	KYD068339217	135,000	Closure
GTE Lighting Winchester, KY	KYD990876138	15,000	Closure
GTE American Mine Tool Madisonville, KY	N/A	250,000	Closure
	TOTAL COSTS	$420,000	

ATTACHMENT D
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

ILLINOIS

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Communication Systems Genoa, IL	ILD001748003	$ 11,500	Closure
GTE Communication Systems Northlake, IL	ILD005070545	29,000	Closure
	TOTAL COSTS	$40,500	

ATTACHMENT D
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

INDIANA

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Lighting Seymour, IN	IND089273338	6,000	Closure
	TOTAL COSTS	6,000	

ATTACHMENT D
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

CALIFORNIA

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Precision Materials Belmont, CA	CAD000107268	$ 20,000	Closure
GTE Sylvania Systems Mountain View, CA	CAD076306836	15,000	Closure
GTE Lenkurt San Carlos, CA	CAD009118605	20,000	Closure
GTE Electrical Equipment Los Angeles, CA	N/A	0*	Closure
GTE Electrical Equipment Sacramento, CA	N/A	0*	Closure
	TOTAL COSTS	$55,000	

* SOLD

ATTACHMENT D
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

TEXAS

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Lenkurt El Paso, TX	TXT000609313	$7,000	Closure
	TOTAL COSTS	$7,000	

ATTACHMENT D
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

MAINE

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Lighting Waterboro, ME	MED067058339	$ 1,000	Closure
GTE Lighting Standish, ME	MED058951047	50,000	Closure/ Post Closur
GTE Lighting Waldoboro, ME	MED001099746	15,000	Closure
GTE Lighting Kezar Falls, ME	MED00840991	30,000	Closure
	TOTAL COSTS	$96,000	

ATTACHMENT D

12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

EPA REGION I

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Lighting Central Falls, RI	RID001198605	50,000	Closure
	TOTAL COSTS	50,000	

ATTACHMENT D
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

EPA REGION II

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Electrical Equip. Caguas, PR	PRD000692608	$ 0*	Closure
GTE Electrical Equip. Canovanas, PR	PRD000692616	0*	Closure
GTE Electrical Equip. Comerio, PR	PRT000040519	0*	Closure
GTE Lighting Fajardo, PR	PRD000692814	15,000	Closure
GTE Precision Mat'ls Gurabo, PR	PRD000692624	20,000	Closure
GTE Gibson Electric Luquillo, PR	PRD090426180	10,000	Closure
GTE Syltron-Exeter Luquillo, PR	PRD000706432	15,000	Closure
GTE Syltron-Towanda Luquillo, PR	N/A	15,000	Closure
	TOTAL COSTS	$75,000	

* SOLD

ATTACHMENT E

12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

PENNSYLVANIA

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Gibson Electric Delmont, Pa	PAD990825408	$ 25,000	Closure
GTE Lighting Montoursville, PA	PAD003050713	20,000	Closure
GTE Circuit Products Muncy, PA	PAD003050846	143,000	Closure
GTE Lighting St. Mary's PA	PAD002124368	15,000	Closure
GTE Chemical & Metallurgical Towanda, PA	PAD003044609	330,000	Closure/ Post-Closure
GTE Parts Wire Plant Warren, PA	PAD002124766	75,000	Closure
GTE Circuit Products Williamsport, PA	PAD000800557	10,000	Closure
GTE Parts York, PA	PAD061107017	53,000	Closure
GTE Lighting Wellsboro, PA	N/A	20,000	Closure
GTE Parts Titusville, PA	N/A	2,000	Closure
	TOTAL COSTS	$693,000	

ATTACHMENT E
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

MASSACHUSETTS

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Sylvania Systems Needham, MA	MAD71705222	$ 11,500	Closure
GTE Lighting Boston St. Salem, MA	MAD000846329	18,000	Closure
GTE Lighting Loring Ave. Salem, MA	MAD002249803	15,000	Closure
GTE Communications Prod. 100 First Ave. Waltham, MA	MAD076568971	11,500	Closure
GTE Laboratories 40 Sylvan Rd. Waltham, MA	MAD000846303	50,000	Closure
GTE Lighting Endicott St., Danvers, MA	MAD053450730	4,000	Closure
GTE Lighting Sylvan Rd., Danvers, MA	MAD080031180	25,000	Closure
GTE Lighting Fall River, MA	MAD043399989	10,000	Closure
GTE Lighting Ipswich, MA	MAD069348829	10,000	Closure
GTE Laboratories Lexington, MA	MAD000846295	15,000	Closure
GTE Communications Products Winter Street., Waltham, MA	MAD000846311	5,000	Closure

ATTACHMENT E
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

MASSACHUSETTS

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Communications Products Westboro, MA	MAT260010223	$ 0	Closure
GTE Lighting Equipment Development Ipswich, MA	N/A	1,000	Closure
	TOTAL COSTS	$176,000	

mbermens Mutual Casualty Company • American Motorists Insurance Company
American Manufacturers Mutual Insurance Company • American Protection Insurance Company

2 World Trade Center, New York, NY 10048 • 212|313-4000

My direct number is:
212|313-

July 21, 1986

United States Environmental Protection Agency
Waste Management Branch - Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: GTE CORPORATION
POLICY NO.: 3ZM 578 330-00
HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

Gentlemen:

This notice is to advise you that in accordance with the provisions of the attached certificate, we are providing your office with legal notice of termination of Pollution Liability Coverage for sudden accidental occurrences. A copy of the Hazardous Waste Facility Certificate that was filed with your department is attached for your reference.

Said termination will be effective 30 days after you receive this letter.

Please contact us immediately on this if you have any questions.

Very truly yours,

AMERICAN MOTORISTS INSURANCE COMPANY

Maureen Mc Carthy
National/International Department
(Special Risk Underwriting)

MMC:mm
Att.

cc: Mr. James H. Doherty
GTE Service Corporation
One Stamford Forum
Stamford, CT 06904

Hazardous Waste Facility Certificate of Pollution Liability Insurance

1. American Motorists Insurance Company, (the "Insurer"), of 5 World Trade Center, New York, New York 10048 hereby certifies that it has issued pollution liability insurance covering bodily injury and property damage to GTE CORPORATION, (the "Insured"), of One Stamford Forum, Stamford, Connecticut 06904 in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at:

Location Name	Address	EPA I.D. #
GTE Electrical Equipment	Cleveland, OH	OHD068891068
GTE Automatic Electric	Genoa, IL	ILD001748003
GTE Automatic Electric	Northlake, IL	ILD005070545
GTE Lighting	Seymour, IN	IND089273338
GTE Unistrut	Wayne, MI	MID067332650

NO MID 098 678 584

for:

- sudden accidental occurrences

The limits of liability are $1,000,000. each occurrence and $2,000,000. annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number 6ZM 578 330, issued on 7/1/82. The effective date of said policy is 7/1/82.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or involvency of the insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Signature of authorized representative of Insurer J. J. Towey

J. J. Towey
Division Underwriting Officer

Authorized Representative of American Motorists Insurance Company
5 World Trade Center
New York, New York 10048

ATTACHMENT C
12-31-83

GTE PRODUCTS OF CONNECTICUT CORPORATION

CLOSURE/POST-CLOSURE COSTS

EPA REGION V

Plant Name & Location	EPA Identification Number	Cost Estimate	Type of Cost
GTE Electrical Equipment Cleveland, OH	OHD068891068	$ 0 *	Closure
GTE Unistrut Wayne, MI	MID067332650 MID098678584	20,000	Closure
	TOTAL COSTS	$20,000	

* SOLD

C.2 Compliance/ Enforcement

Edward H. McNamara
County Executive

DEPARTMENT OF PUBLIC HEALTH
WAYNE COUNTY

VERNICE DAVIS-ANTHONY, MPH
Health Officer
CYNTHIA TAUEG, MPH
Deputy Health Officer
DONALD LAWRENCHUK, M.D., MPH
Medical Director
Wayne County Complex
Westland, Michigan 48185
Telephone: (313) 467-3300

August 14, 1989

Gary Ambus
Manufacturing Engineer, Environmental Compliance
Unitstrut Corp.
35660 Clinton
Wayne, MI 48184

41185 Wayne Rd

LB=X

RE: Hazardous Waste Inspection - MID098678584
Land Ban

Dear Mr. Ambus:

On August 11, 1989, an inspection was conducted at your facility located at 35660 Clinton, Wayne. The purpose of the inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended; Michigan's Hazardous Waste Management Act, Act 64 P.A. of 1979, as amended; Michigan's Liquid Industrial Waste Hauling Act, Act 136, P.A. of 1969, as amended; and Land Disposal Restriction requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

As a result of that inspection, it has been determined that your facility is in violation of the following requirements:

1. 40 CFR 262.20 (a); Act 64, R299.9304(2)
These sections require generators to provide a unique 5 digit manifest document number in item one of the MDNR uniform Hazardous Waste Manifest form.

2. 40 CFR 265.15(c); Act 64, R299.9306(1,d)
These sections require generators to provide all employees involved in the management of hazardous waste with a yearly training update in normal and emergency procedures in the handling of such waste.

3. 40 CFR 268.7
This section requires generators to maintain a copy of each land disposal restricted waste notification/certification form for a period of at least 5 years from the date of shipment.

ENVIRONMENTAL HEALTH DIVISION
5454 S. Venoy
Wayne, Michigan 48184
Telephone: (313) 326-4900

We request your response by September 14, 1989, documenting your corrective actions to these violations.

If you have any questions regarding this matter, please contact me at (313) 326-4900.

Sincerely,

Henry R. Maciejewski

Henry R. Maciejewski, M.S., R.S.
Hazardous Waste Management Section

HRM:kk

cc: Michigan Department of Natural Resources

Encl.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Unistruct

U.S. EPA I.D. No.: MID 098678584

Street: 35660 Clinton

City: Wayne State: Michigan Zip Code: 48184

Telephone: (313) 721-4040

Operator: Same

Street: ———

City: ——— State: ——— Zip Code: ———

Telephone: ———

Owner: Unistruct Corp

Street: 777 E. Eisenhower, Suite 600

City: Ann Arbor State: Mich Zip Code: 48108

Telephone: (313) 930-0030

Inspection Date: 8/11/89 Time: 8:30-9:30 Weather Conditions: ———

	Name	Affiliation	Telephone
Inspectors:	Henry R. Marcewski	Wayne Co Health Dept	(313) 326-4900

Facility Representatives: ———

———

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator	X	—	X	—
Transporter	—	—	—	—
Treater	—	—	—	—
Storer	—	—	—	—
Disposer	—	—	—	—

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

____ Yes ____ No ✓ NA

If yes, check the appropriate treatability group.

___ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
___ Pharmaceutical wastewater containing spent methylene chloride
___ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

____ Yes ____ No ✓ NA

If yes, specify the method: _____

b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

____ Yes ____ No ✓ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

_____
_____
_____

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

____ Yes ____ No ✓ NA

If yes, check the appropriate treatability group.

____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
____ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater

B. Waste Analysis

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

____ Yes ____ No ✓ NA

How was this determination made?

- Knowledge of waste

____ Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate.

- TCLP

____ Yes ____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

____ Yes ____ No ✓ NA

If yes, specify the waste stream: _____

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes ____ No ✓ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?

_____

_____

_____

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ____ No ✓ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ✓ No ____ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

____ Liquid hazardous waste having a pH less than or equal to 2

✓ Liquid hazardous waste containing metals

____ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

____ Yes ✓ No ____ NA

If yes, is any supporting data available for review? Describe how this is adequate._____

- Testing

✓ Yes ____ No ____ NA

If yes, list test method used: E.P. Tox

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

____ Yes ____ No ✓ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ✓ No ____ NA

3. First Third Wastes:

a. Does the generator correctly determine the appropriate treatment standard of the waste?

____ Yes ____ No ✓ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

____ Yes ____ No ____ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

____ Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate._____

- TCLP

  ____ Yes ____ No ____ NA

- Total Constituent Analysis

  ____ Yes ____ No ____ NA

  Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

  _____

  _____

c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

   ____ Yes ____ No ____ NA

d. How does the generator test the waste when a process or waste stream changes?

   _____

   _____

   _____

C. Management

1. On-Site Management

   Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

   ____ Yes X No

   If yes, the TSD Checklist must be completed.

2. Off-Site Management

   a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

      X Yes ____ No

   b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

      X Yes ____ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	✓ Yes	____ No
Applicable treatment standards	✓ Yes	____ No
Manifest number	✓ Yes	____ No
Waste analysis data, if available	✓ Yes	____ No

Identify off-site treatment or storage facilities: Environmental Waste Control, Inkster

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes ✓ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

____ Yes ____ No

f. Does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

____ Yes ✓ No ____ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

____ Yes ____ No

i. If yes, does the notification contain the following information?

EPA Hazardous waste number	____ Yes	____ No
The corresponding treatment standards and all applicable prohibitions	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Date the waste is subject to the prohibitions	____ Yes	____ No

j. Does the generator retain copies of all notices and certifications for a period of 5 years?

____ Yes ____X____ No

D. Demonstration and Certification -- "Soft Hammer" Wastes

a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

____ Yes ____ No

b. Has the generator submitted to the Regional Adminstration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?	____ Yes	____ No
Addresses	____ Yes	____ No
Telephone Numbers	____ Yes	____ No
Contact dates	____ Yes	____ No

Attach a copy of the demonstration and certification

c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

____ Yes ____ No

If yes, attach a copy of written discussion.

d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number _____ Yes _____ No

(ii) Manifest number _____ Yes _____ No

(iii) Waste analysis data, if available _____ Yes _____ No

h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____ No

If yes, list types of waste treatment units and processes:

9/25/9-2-83 Ordered

RCRA Inspection Report

EPA Identification Number: M I D 0 9 8 6 7 8 5 8 4

Installation Name: Unistrut Division - GTE Products Corporation

Location Address: 35660 Clinton P.O. Box 802

City: Wayne State: Michigan 48184

Date of inspection: 7/26/83 Time of inspection (from) 0800 (to) 0830

Person(s) interviewed	Title	Telephone
James C. Heim	Env. Eng	(313) 721-4040

Inspector(s)	Agency/Title	Telephone
Larry AuBuchon	MDNR-HWD/WQS	(313) 368-3335

Installation Activity (mark only one box) — Inspection Form(s)

II	Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation	A
II	Treatment/Storage/Disposal (no generation or Transportation)	A
II	Generation and Transportation	B, C
II	Generation only	B
II	Transportation only	C

This EPA # replaced old number of MID067332650. Facility has withdrawn storage status and is classed as a small quantity generator. (See ltr dtd. 1/12/82 from Karl Klepitsch). No waste has been handled that is classed as hazardous for the past 1½ - 2 yrs.

cc: EPA
J. Bohunsky
K. Burda

RCRA Inspection Report

PA Identification Number: MID 067332650

Installation Name: Unistrut Division - GTE Products Corporation

Location Address: Clinton & Elizabeth St.

City: Wayne State: MI

Date of inspection: 7/26/83 Time of inspection (from) 0800 (to) 0830

Person(s) interviewed	Title	Telephone
James C. Heim	Env. Eng.	(313) 721-4040

Inspector(s)	Agency/Title	Telephone
Larry AuBuchon	MDNR-HWD/WQS	(313) 368-3335

Installation Activity (mark only one box) Inspection Form(s)

☐	Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation	A
☐	Treatment/Storage/Disposal (no generation or Transportation)	A
☐	Generation and Transportation	B, C
☐	Generation only	B
☐	Transportation only	C

Facility had EPA No. changed to MID098678584. See that facility report.

cc: EPA
K Burda
J. Bohunsky

June 21, 1982

Mr. James C. Heim, Environmental Engineer
Unistrut Division
GTE Products Corporation
35660 Clinton
P.O. Box 802
Wayne, Michigan 48184

Dear Mr. Heim:

On June 8, 1982, I conducted an investigation of your facility located at the above address. The purpose of the inspection was to evaluate compliance of the facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended.

The attached inspection report has been formulated based on the information you supplied.

If you have any questions, please feel free to call me at (517) 373-1818.

Sincerely,

RESOURCE RECOVERY DIVISION

Earle Latimer, Water Quality Specialist
Hazardous Waste Section

EL:cs

cc: Al Howard

Not logged in - inspection forms not comp ted. AL HOWARD EPA

RCRA Inspection Report

EPA Identification Number: M I D 0 9 8 6 7 8 5 8 4

Installation Name: GTE, Unistrut Div.

Location Address: 35660 Clinton

City: Wayne State: MI

Date of inspection: 6-8-82 Time of inspection (from) 11:45 (to) 12:30

Person(s) interviewed	Title	Telephone
James C. Heim	Env. Eng.	313-721-4040

Inspector(s)	Agency/Title	Telephone
Earle Latimer	DNR, RRD, Wat. Qual. Spec.	517-373-1818

Installation Activity (mark only one box) — Inspection Form(s)

- ☐ Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation — A
- ☐ Treatment/Storage/Disposal (no generation or Transportation) — A
- ☐ Generation and Transportation — B, C
- ☐ Generation only — B
- ☐ Transportation only — C

over →

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JUN 23 1982
ACT 64

According to Mr. James C. Heim, Environmental Engineer with Unistrut Division, GTE Products Corporation, the GTE Company has not generated, treated, stored, or disposed of any hazardous waste for quite some time and would only like to retain its EPA ID number for future use.